

Request for Enforcement at KP McNamara  
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**DEPARTMENT OF ECOLOGY  
RECOMMENDATION FOR ENFORCEMENT**

November 12, 2008

To: K Seiler, Section Manager, Hazardous Waste and Toxics Reduction Program, Southwest Regional Office

From: Dee Williams, Compliance Inspector Southwest Regional Office

Through: Ava Edmonson, Compliance Unit Manager, Southwest Regional Office

Subject: Recommendation for Enforcement at KP McNamara, WAH000025256

**BACKGROUND**

KP McNamara (KP) runs several tote-cleaning operations in the United States. This site is located at 503 SE Maritime Ave., Bldg 5 Ste B, Vancouver, WA 98661, and is located within close proximity to the Columbia River. Three people are employed in the shop.

KP cleans, restores and deconstructs 275- to 330-gallon totes. These totes are supposed to arrive 'empty' (as defined in WAC 173-303-040), but may contain a small amount of residual material such as phenol-formaldehyde resins, paints, biocides, and water treatment chemicals. Product residuals are accumulated in 55-gallon drums. The waste is then designated and managed off-site. After residuals are removed from the tote, KP cuts and crushes the tote for off-site plastics recycling/disposal, or they rinse the tote with soap/water. The clean totes are reconditioned and restored for reuse.

Historically, soapy rinse water was allowed to passively drain via a floor trench to a sump, and was eventually pumped to two 2,500-gallon plastic tanks. Designation conducted by the facility had previously determined that the waste did not designate as dangerous waste, and the wastewater was transported in batch loads to Pacific Power Vac in Portland, Oregon, as a non-hazardous wastewater.

KP McNamara is a Large Quantity Generator of dangerous waste. They routinely generate ignitable, toxic and/or corrosive dangerous waste drained out of empty totes.

In August 2007, Ecology conducted a routine unannounced inspection at KP. Nine violations were cited at the time. The most serious violation centered on Ecology's observation that approximately 300-gallons of corrosive dangerous waste had been accumulated in a concrete floor sump. This waste had a pH of 14, and was generated as rinse-water from the tote washing process. At the time, KP planned to mix the waste with other rinse-water and manage it off-site as non-hazardous waste.



Ecology issued an Immediate Action Letter following the August 2007 inspection. That letter directed KP

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thien tegfrifetl yd ore a csumapco poyf hlemme dAi cat lie mat redr  
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i n c l a s s e d a c h m e n t

### FINDINGS by hr oSuegpt e 008

On May 2008, Ecology would circulate a draft permit application (DPA) during  
the inspection of boating sites where the following regulations (WAC 173-310) would follow:

**WAC 173-303-F1a411 (a) appropriate dam best h awdse n  
send a a g a t e d e a l i g n daatnegde wausst a no ut - off a d i a l i t y .  
K Pd i s p o s e s h i p mœntast et -ooxialcyg ewassate (s e i n s e t - w a t e r )  
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olflow configurations :**

- K Pd indosth t pweasdr aUn i fDoarmg eW a s M a n i f e s t e a d  
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- K Pd indosth t pweas tt he r o a u g h g i sdaenrgeedw ass t e a n s p o r t e r .  
P P V a u l t t h e a s w i e t h col ut p r e p at rhie a g the e t t i m e g  
r e q u i r e d a m g ewass t e a n s p o r t e r s .
- K Pd indohta vco n f i rfmraotn Vb m a t h e p u alcdc s p a t et -ooxi lcy  
d a n g e wass t e a n sh i n g t h e w e s a w r i t b e a ri r t h a a t i o n  
t h P o r t s d a m l i o l O i r t e y g D o e n p a r t m E n v i r o n m e n t a l l y  
a p p r o v P P d / m a n a g e m e n t a waste .

On May 92, 0 0 B c, o l foog nyw aarni es p eR et pi a m N o t t G e m p t l o y  
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c o m p a n y d e n o u n l s d t h r a n t a s e e t t i h W A C 1 7 3 - 3 0 3 - 1 4 1 ( 2 ) r e q u i r e  
A c o p y E c o l o g y a t m e p a r t i n c l A d d e a c h m e n t

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On July 30, 2008, I recognized KrP's violation of environmental laws and regulations. I issued a notice of violation to KrP on August 20, 2008, detailing the following requirements:

KPS subsequently failed to adequately respond to my notice of violation. KrP formally acknowledged its responsibility.

#### FINDING October 2008

On October 20, 2008, I investigated KrP's management of currency - overstatement of its assets and unannounced KrP's failure to maintain its financial records in accordance with generally accepted accounting principles.

Several employees at KrP were interviewed about their experience with KrP's financial reporting. They reported that KrP's financial reporting was prepared without supervision.

KP had accumulated about \$210,000 in unpaid bills. The two main problems identified were the lack of equipment and supplies stored in the office and a lack of available funds to pay bills.



To test at KrP's facility.

During October 2008, I reviewed KrP's financial statements and found significant discrepancies between the financial statements and the actual financial position of KrP. KrP's financial statements showed assets of approximately \$210,000, while the company had only about \$100,000 in cash and no other assets. KrP's financial statements also showed liabilities of approximately \$100,000, while the company had no liabilities. KrP's financial statements showed net income of approximately \$100,000, while the company had no net income. KrP's financial statements showed net assets of approximately \$100,000, while the company had no net assets.



Note at KrP. Labels indicate toxic dangerous waste.

On October 17, 2008, I found KrP to be in violation of environmental laws and regulations. I issued a notice of violation to KrP on October 17, 2008, detailing the following requirements:

Requie~~d~~ for cæknR Mr Namara  
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The o s t e r i v i o u s l a b u n d a n c e r a e s f o l l o w s :

- WAC173 - 303 F14 1t (unseen) p r o p l r "o.cieaduandest h ovh se n s e n d a s t g a t e d o s i l g r d a a t n g d e w a s s a m o u t - o ff-ascti k P i e t y . i n a p p r o d p i r s i p a o t f e e l s t y e i p m o e n t t a s t e t - o o x h i a l o g e w a s s u t e ( r i n s e ) w a s t e a t t e a r s ) e h s e h i p m a s t e o f f w s i t t a c t a h g e r o u s w a s m a e n i f t s w a s b e a d r a n s p o t h a e P t A / S T r a t e s p o r t e r I d e n t i n g u n c b a a t m i d p o i n t h c o u n t i r m h a t t i e s a e f a c w g s t y p e r m i t a t c e d l a t g e w a s s u t e .
- WAC173 - 303 F2i OI0prre o p a c t y m u d l a a n t g e e w a s s a c o n t a o n t e a m s K s Pa c c u m u d l a a n t g e e d w a s s u t e r u n t s t a e n t a n k s t h a e m o p t r o p l e a b d e w l e e n d o p t r o p e r l y o d r e s t p e r o t h e a g o o i d t e a g m d t y e m a n a g e i d d e q u a t s e p a c c i e s s l e e c o n d a r y c o n t a i n m e n t .
- WAC173 - 303 a 12 & 4 (Fda) i It u r b e t a p a r m i t e e t h s e t a n d a r d s f o o r p e r a a t d i a n g g e w a s s e e a t t n e o t a a n g d e i s p o t s D a c i l l i t y . K Pa c c e p l a e n g e w a s s u t e o n f g e n e e a t h e a y c s c e p t b e t h s a t w e m e o "t e m p t y e f a i s t WAC173 - 303 J h t 6 C e s n t a a i n g d i f i c a n t a m o u n e t x t r e m a e z l a y r d g a s a r a b o l x i c d a n g & P s o t u o s t h a d a s t t e . d a n g e w a s s u t e g r a p a r k l i o w t g , t h a e u t o n c o a r t y a i n s p e i n l t l o r c o n t r o l s .

#### DISCUSSION:

The R eque~~d~~ for cæknR management K B p o r m a n a g e m e i n n s e (water s t a t e - o o x h i a l o g e r o u s a n d a s s e t v e ) r a l v i o e l p o r t a t i o n A t C 1 7 3 - 3 0 3 . The s e o l a p t r i e s r e a s t i e g h i r f i i t s k a u m t h e a a r t t h e e n v i r o n m e n t . T a b A l a t t a o p h r o d a s l e n s m a f y i o l a c t i t a c k P s .

#### O t h e r s i d e r a t i o n s :

- A . N o c o n c e n t r a l e e n b a t i h s e a d t E c o b y o g y .
- B . E c o n o m i c p a k R b c o n s u i l n d a i n d t a t h o d e s s h i p p a n g e r o u s w a s t e T r e a t m e n t n a t a a n g d e i s p o t s a D a c i l l i t y . \$ 3 . 0 0 / g a l p r o t P t W a s a b \$ @ t 5 0 / g a l s a l v o e n d u g h l y . \$ 5 0 , b y m a n a g w i a n g t h e r o P u P g V h n s t o e f a h d r o a t g s h o .

K Pa l s a v r a d n e y s t b o y w a s g v e @ 0 - d a y s s h i p m e n t r o u g h \$ 1 1 3 y 5 a t d o r o B a y h o l d b i n n t g a s K B a , v o i t d h e a d s c e t s .

- C . E c o l i o g o y a t w a o f a n s e n s i t i v e i n t r i e s s i o n w e r s c e s e r s , s t a k e h o l d e t r a o i n n s t i e d r e e r s . t s )
- D . W o r k l i o n a p d l i c i a n t c i l t a p s t e n t i h e d c f o p p a t p e n a l t y w h i c h u r l e d s i u a l m a d d i t t o i h o w o r k l o o f a h t E s c o l i o n g s y p a c t o r A t t o G e r e g s r a a l f f .
- E . E c o l o g y o n h s a u s l i t t h e a n c o W i v e R e s t e P r r o e t e P c r t o i g n a m , C l a C r o k u n H t e y a D e p a r t a m e t r h s e t a t e e p a r t o n l e a r b o n d I n d u s T h e e t h a e g r e n a r v e o s r k i n n d g e p e n b d u e n t e l y , c o o r d i n n a f o i r m t g a t d o n e i s s s k s .
- F . T h e a r e n e a l l e g a e q u i n s i n g v e s t i g a t i o n .

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G. History of health problems at the facility and surrounding areas.  
f. Description of corrective actions taken to address violations.  
H. Environmental impact analysis.  
I. Economic consequences.

The following activities are proposed to mitigate WAC 173-303 requirements:  
The emphasis is on compliance - compliance includes no significant risk reduction measures. The emphasis is on compliance - compliance includes no significant risk reduction measures, continuing environmental monitoring.

#### RECOMMENDATION - ADMINISTRATIVE ORDER:

To add relevant administrative action (and accordingly WAC 173-303), recommend administrative action (and accordingly WAC 173-303) to the appropriate authority for review and implementation.

#### RECOMMENDATION:

I recommend that the facility be issued a Disappropriação de solo - only dangerous waste accepted to a nocturnal treatment and disposal facility. This is in accordance with the WAC 173-303-14(12) regarding the removal of dangerous wastes from the environment.

The following recommendations are made to the facility to ensure protection of public health and the environment:

#### Penalty Determination

Violations	Category	Proposed Penalty	Optimal Penalty	Reduced Penalty
WAC 173-303-F1a4i1lt <u>dangerous wastes were sent to a treated hazardous waste site off-site without a permit</u>	Major	\$ 6,000	\$ 10,000	\$ 10,000
WAC 173-303-F1a4i1lt <u>dangerous wastes were sent to a treated hazardous waste site off-site without a permit</u>	Major	\$ 6,000	\$ 10,000	\$ 10,000
<b>TOTAL</b>		<b>\$ 6,000</b>	<b>\$ 10,000</b>	<b>\$ 20,000</b>

The enforcement officer is calculating the proposed penalty based on the following factors:

Violation	Observation / Evidence	Increase (+), Decrease (-) in Range of Penalty
Dangerous wastes were managed off-site	No reduction in penalty is	

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Human Health Environment	with upper shipping paper with carding.	importation consideration discracticon.
	The transport of EEPAY did not start along with the was intended to be certified transportation material handling was.	
	KPhad does not have a factory (PPQ) quality control system. WhiKPhad entered into a accordance with the standard health theorem did not meet many shortcomings throughout pressure testing facility could acceptance test.	
	KPhad rejected because it was not able to identify the cause of driving (assembly line), and does not have a was ordered to correct the labeling.	
	KPhad conducted a water sample the Cormier Grauusmod Water sampling in Taipeh determined that nitrogenous waste analysis showed that ground water penetration (groundwater testing) fewer than 500 ppm coupled with a low soil ground water)	
Historical Information	a number of ionosphere conductivity depth profile had been established of Romania for certain areas.	WhiKPhad demonstrated cavilliarity Ecological not take over unaffordable recommended.
	KPhad if each has set the formation for convenant \$100, penalization of mismanagement dangerous.	
	The Wall Research Project Program to combat industrial pollution expressed a lack of and a wide range of address problems.	
	Historical information Ecological sustainability, complaints by monitored.	

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	a b i t d i a y n f a c i o n p l i o a n d r i e m e .  K Pf I a g rdains tr ley E a c r o d ledg y. ' s d i r e c t c e a s e f -s h i i p o n t s P P V u n t h k y u d l e m o n s t r a t e c o m p l i wai M A C 1 7 3 - 3 0 3 - 1 4 1 ( 2 ) .	
Small business incentives	K Pi s o d o n s i d d o r e a s d m a l l bus i n e s s o r t d i l y e i b s i t e o p e r a t a h r e f e a c i i l i t u s ( S h i o C a l i fa o n t h a i s h i n g t o n ) .  T h e o m p a s n a y a d o \$ 5 0 , 0 0 0 m a n a g i i d s n g e w a s t e r o u g h P P V .	N o r e d u c i t p i e o n n a i s t y y w a r r a b a t s e d d c o n s i d e r a t i o n d i s c r e a t i o n .

A f t c o m s i d d a b i m a g e s c r e f t a i o t h a e r s y o m n D e p t d B w i n a p e n a l t y  
o \$ 2 0 , 0 0 0 g p e m a c l o t u l y l a d v b e e d n e t e r m i n E a c e b o o g n y s i d e j e d  
e a c s h i p r o d r a t g e w a s s e t v e s a e l t P V a , n 2 l . b ) . o t h i s t a t n h a e t s  
E c o l o g i c P d a r c c e p n o i n n - g e t n p t h a a s t e h p e e n a w l o t u l a l v e  
b e e \$ n 7 0 , 0 T O h 0 p . e n a c l o t u l y l a d v b e e e n v d n i g h E o r o l h a g d y o n s i d b e e d  
n u m e r r o e u p s e a b l a c t i i a c k P s .

#### REFERENCES

- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e p t e & 6 2 0 r 0 7  
L e t a t r e b n s p e R c e t p i c o m t .
- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e p t e & 6 2 0 r 0 7 .
- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e b n s p e R c e t p i c o m t .
- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e b n s p e R c e t p i c o m t .
- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e b n s p e R c e t p i c o m t .
- Attac h m e n t 2 , 0 0 1 7 m m e d A i c t l i e t a t r e b n s p e R c e t p i c o m t .

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**Table of Violations**

<b>Violation</b>	<b>Date Observed</b>
WAC173 - 303 - F0a7i01(tu)es i g w a s t e s . K P c o u n l a b t e m o n s t r u a d e t h e s t a t e f n u b l a y d e q u a t e l y . d e s i g n p a r t i o n f f - d s i s t p o s a l .	Aug 2008
WAC173 - 303F-a1 i415uor i t i g p a i d r s l e a s e s . S p i w e l r e b s e r a v r e o d p u n i p e s l a d i l t e e a t r i n t s a e n k s Q c t o 2008 R e s i w a s l s b o s e r o v o e z d i f r g v n a l v d s t e s o o e d s i d e .	Aug 2008
WAC173 - 303 a170y( e 2 f ) e r t e 8 0 ( F1a ) i : I t u o r i e o p e r l y p r e p a r h e a z a r d v a u s h a n i f e s t . M a n i # 0 0 1 6 9 d 2 n 5 0 9 t n c l a u d e n s p a m p e n m b e r , E P A d e n t i f i f u r a t i o n	Aug 2008
WAC173 - 303 - 20 a ( W A C 1 7 3 - i 3 0 ) 3 , - ( 6 5 ) 0 , ( 4 6 ) y , r e f e r E a d t u a r e e t t h e a n g e r w a u s t a n k t o r a g e r e q u i r e m e n t s . K P w a a c c u m u l a t i o n g w a s t e n i n - g r o l u c o n d p w o " r i t a s e l a s h ' s t a i n l e s e s - c i t r e a l n N a t n o o f n h t e a n k s y s t e m s d e q u a t e s c o m o t r a d i a t i m y e g i d l q t a v a e d e q u a t e c o n t o o p m p d a b e a n t b y e m o p t r o p e n s y e t c o t e p d r e v e n t r e l e a s e s e n v i r o n m e n t .	Aug 2008 May 2008
WAC173 - 303 - 2a0n0b(y1 e f e ) e 3 0 ( F a i ) I t u o r i e o v a n d e a d e q u a t e p e r s o n n e g r i m a i I t u o r i e e p a n n i a i n t a i n a w r i t p t e e m s o n m a i p l a g r i m a i n t t a r i a n i n e a g r d s . O p e r a d t i o n s t e e a n b l t d e f t h d e i f f e b r e t n w c e a n g e r o u s a n d o n - d a n g e r a s e n s i l o d s t e e a n w a o t h e i s a k s s o c i a t e d w i t h n e a n a g e r a d n i t p h a s t e s e d y i n d o s t e e c o n c e r n e d a b o s p i t l d l h s f l o o r e b o t h a c c u m u l a t i o n g d r i p h u i t h e f l o o r m p n t a d d r e b s E e c b l d N g y r k e i n d o s t e e t m o u n d e r s t a n d i n d o a t d e q u a t e l y h D a d r g r e s s u s W a s t e R e g u l a t i o n s .	Aug 2008
WAC173 - 303 - 2a0n0d( b e y f e ) e 3 5 ( F a i ) I t u o r i e e p a n d m a i n t a i n d e q u a t e r i n g P e l n a m y d m e r g e p n r c o y c e d u r e s . A C o n t i n g e b a v a y s o p t r e p a b y e d h e D p i e t r a c t o u n l s a t d e m o n s a f r u l t h e r s t o a n d f e i a n g i l i t y ' s p r o c e s s e s .	Aug 2008
WAC173 - 303 - F1a4i1(tu)s a p p r o p r i a t e d a n n d s m e t h o d s e n d a s a g a t e d e s a l g n d a a t n e g d e w o a s t e a n o u t - o f - f a c i l i t y . K P d i s p o s i f e d v e i p m e s t a t e t - o o d i a y g e w a s t e i n s e - w a t e r h y o R a g d P b i w @ a & P P V R o r t O a e g o n .	May 2008
WAC173 - 303 - 2a0n0d(y1 e f b ) e 3 0 ( F6a ) i : I t u o r e n d u c t w e e k l i n s p e c d f l a n g e w o a s s a e c u m u l a t e d a n d c o n t a i n e r s . K P s k i p p e d a o s n t w e e d f i n s p e c t i o n s .	May 2008
WAC173 - 303 a170y( e 2 f ) e r t e 0 0 ( e 1 F a ) d l t u d r a b e l c o n t a a s t H a z a r d w a s t e r ' D a n g e W a s t e a n d / f o r i l t p r o v i l d a b t e h l a d e n t t i h n a e j s o r i s k . T o t e d r u m s r e m o n t a r k a e d a n g e w a s t e d e f t h e r i s k .	Aug 2008 Oct 2008

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<p><b>WAC173 - 303 - 2a0n0d(312)0b(yt)fer Fra d tuor end u c genefrad iilninstpye c ft h o m s e rsep itldlhseon c f t i n s t hwea r e h o A n s d t e atkoy tweesroeb s e r v t h e u it ssitdoer a g e y a rkDpd in doha vaef or ns g s tfeann sp e t h seitnogr yaag red .</b></p>	<p>Aug u2s0t0 7 Oct 02@08 8</p>
<p><b>WAC173 - 303 - 2a0n0d(312)0b(yt)fer Fra d tuor end u c requi re foempr ter a a s d a n g e mcausst e a t m e n t , a n d i s p o s t a c i l i t y . K Pa c c e pt to etforsomf f g s e in teer aT th e r s s e . tweesne o "t e m p t y " a s d e f W A C 1 d 7 3 - 3 0 3 - a 1 n 6 5 0 P 0 p e r a t s e d o a n g e r o u s w a s t e e a t m e n t a t a n g d e i s p o s a l l i t y .</b></p>	<p>Aug u2s0t0 7 Oct 02@08 8</p>
<p><b>NOTE: Aug u. s2t0a0n70 c t o 2 @ 0 8 B q o l o g y i e t a s u t h o n i t y WAC173 - 303 - 2a0n0d(312)0b(yt)fer Fra d tuor end u c d a n g e w a s t e e a t m e n t a t a n g d e i s p o s a l l i t y .</b></p>	
<p><b>WAC173 - 303 - 2a0n0d(yt &amp; f b ) e 3 4 0 a(n3d)6 3 0 ( 5 )a(i cl) t m a i n t a a t h n i r t y n - i n n i m l u m s s i p e a b e t w e r o w s f c o n t a i n s e t d e c c u m u d a r t g e mcausst e a n d a i l t u r e m a i n t a d i e n g u a i t s s i p e a f e u r n o b s t r m a c t e n d o n t e m e r g e p n e c r y s o a n e b u i p w e i t t i h r e a c i l i t y . T h e w e r n e i n e t y e t o e s t a t e d - a o m g l e y w a s s e s f i d e w a r e h o T h e s e t e tweesre t o w e d haoduetq uaai t s e l p e a c e b e t w e e n le ism i a t c i c n e t s o m p laen t r e s p e c t i o n .</b></p>	<p>Oct 02@08 8</p>
<p><b>WAC173 - 303 a 1 7 0 r ( 8 f ) e r 2 0 0 c e 1 A q a y m u l w a t s e t d e h a s e m a i o n e d s f i o m r t h a g n d a y s . T o twees roen - s l i t n g e 8 10 - d a y s .</b></p>	<p>Oct 02@08 8</p>
<p><b>WAC173 - 303 - 2a0n0d(yt &amp; f b ) e 3 0 c ( 7 a ) i : l t u p r e o v i d e a d e q u a s e c o n d a n y t a i r s n y e n t e m . O v e 3 r 0 , 0 g 0 0 l loofhasn g e w a s w a s e i s t g o r i e d K E e Mc N a m a w a r s h o l d s e e n s o a t p p e t a h r a t h e a r e h d u s e n id c u s b y s t c e o n u l d n t 1 a 0 i % n t h v i s l u a m s e e q u i r e d .</b></p>	<p>Oct 02@08 8</p>





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P O Box #77701 Olympia, Washington 98504 - 7735407 - 6300

December 8

**CERTIFIED MAIL**  
70 0364 5000 0617 5352 84

M rK.e rMrcyN a m a r a  
KP McNamara  
397 Hamlin Avenue  
C le v e OI Ha4n4d1, 14

RE : K RM c N a m b o r a a t 5 0 8 M a r i A v i n g , V a n c o u v e r B C V 8 6 6 1  
R C R A M H 0 0 0 1 0 6 0 3

Dear Mr McNamara:

Enclosed is document No. 2 regarding your application for a Dangerous Waste Regulation - 301(a) permit. This document contains information about the environmental impact of the proposed facility and its potential effects on the community.

If you have any questions or concerns, please do not hesitate to contact me at (304) 243-0001. Thank you for your consideration / Penalty.

A color reproduction of the document is attached. It includes the following information: the location of the facility, the type of waste to be treated, the proposed treatment process, and the environmental impact statement.

Sincerely,

(  )

Kelli Seeger  
Hazardous & Residential Pollution  
Southwest Regional Office

Enclosures

cc : Pendleton, Shirley  
Douglas Wise, City of Vancouver  
(douglas.wise@city.vancouver.wa.us)



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

IN THE MATTER OF ADMINISTRATIVE ACTION:	ORDER No 6237
Mr. Keir McNamara KPMcNamara	

To : Mr. Keir McNamara personally  
 39 Hamlin Avenue  
 Cleveland, OH 44114

For the State of Washington  
 500 Marietta Street  
 Vancover 88661  
 RCRA ID 00010603

This administrative proceeding against Mr. Keir McNamara  
 (Collector of Solid Waste) is to implement a consent decree entered  
 (Chapter 173-303 RCW) on December 1, 1995, by the State of Washington  
 (Chairperson of the Department of Ecology) and the  
 Department of Ecology (DPS) on December 1, 1995, concerning  
 compliance with certain requirements contained in Chapter  
 7Q. RCW.

The purpose of this proceeding is to make a final determination  
 concerning the enforcement of the requirements contained in the  
 consent decree, including the imposition of civil penalties, including  
 following:

- WAC 173-303 F 14 11t (1)(a): To prohibit conduct of business  
 which endangers public health or welfare of the state  
 facility, including the issuance of permits, if it is known that  
 dangerous wastes are being generated, treated, stored, or disposed  
 of in a manner which poses a threat to public health or welfare.  
 EPA / ST staff notes that if it is found that there  
 is a violation of this provision, it will be referred to the  
 Office of the Attorney General for further action.
- WAC 173-303 F 2 10: To require payment of civil penalties  
 for noncompliance with the terms of the consent decree  
 issued by the Department of Ecology, including the imposition of  
 interest on unpaid amounts.
- 173-303n-d24800: To prohibit operation of the facility  
 if it is found that the facility is not in compliance with  
 applicable laws and regulations, including the issuance of  
 orders to correct violations.

K e r MrcyN a m a r K a M a N d m a r a  
 D e c e m b e r 0 8  
 Pa g e 6

" e m p a t s y e " f i l i W A C 1 7 3 - 3 0 3 a n d 1 0 0 n ( 1 2 ) i , r e g i o n a l f i c a n t a m o u n  
 o f g n i e a b t h a e z l a y a d n o t u s d a a g e w r a o s u t s e p . p e r a s e d  
 d a n g e r a s u t s e e a t s m e o n r a n g h e s p o a s c a w h e r e t y c e p h e d  
 t o t c o n t a d j a n n g e w r a o s u t s e

G i v t e h a e b o f v i e n d a i m g a s a , m o r w a r t 0 . 1 0 . 5 i t e 9 5 e t r h e d  
 t a k a f e o l l a o t i n @ n :

#### **1 .WAC1 7 3 - 3 9 3 a n d W A C 1 7 3 - 3 0 3 ( 1 W a s D e \$ i g n a t i o n**

U p o r n e c e t p G i r s d e m s p r e p e r i g n e t w i b o s n t e s e r b a k t R e d  
 i n c l u d i n g t i m f d r e i c h s e t h e s w a t e r u p t r a n s p o r t e n t  
 a b s o r b e n t .

D o c u m e n t o d a e t s i o g n a h i h c r b u u d t e b t e l i m f d e p o e b a e n a l y t i c a l  
 r e s a d e s i g n a t i o n d r y o n t w a c h s t a l d i a l g o n a l l e s s o .  
 i n c l u d i n g t i m f d r e i c h s e t h e s w a t e r u p t r a n s p o r t e n t  
 i n f o r m a t i o n r u n n a b t k o e p t s i i f t o a m i n i m u m y e a a r s d  
 m u s t e n a d a e v a i f l a r k e l e p o r t e q u i f e l s t c o r w a W A C 1 7 3 - 3 0 ; 3 - 2 1 0 .

#### **2 .WAC1 7-33 0 3 - 1-4D1i(s2p)o c s t a t e D a n g y W a s t e**

U p o r n e c e t p G i r s d e m s p r e p e r i g n e t p o c f a l t e l a o n g l e w r a o s u t s i e s e -  
 w a t A l s h i p m e u n s t e s a n i f a e n c t a e d b y a d t a n s v p b a n h a e l r i d .  
 E P A / s l t d a e t h e t i n f u i m b a t h i s i h o i n p m e u n s t e s e c e a i t s e i d t h e a s t  
 a u t h o t r a i c z e s d p a t e l a o n g l e w r a o s u t s i s h i p m e u n s t e s e p o r t e d  
 a n n u a s t e q u i W A C 1 7 3 a 3 0 3 - 2 2 0 .

#### **W A C 1 7 3 3 0 3 - S p a c i s c h a t r d g h e e n v i r o n m e n t**

U p o r n e c e t p G i r s d e m s u h a b p o l l i s s c h a e p g r e s p r e e p l o y r t e d ,  
 d o c u m e n t d i g T a h t i e a d c . I s ! p l i d l e a s t t h h u m e a t a e m t t h h e  
 e n v i r o n m e n t h e s r i d l e t . P o b e i l d i n g .

#### **4 .WAC1 7 3 - 3 0 3 a n d y (e 2 ) e r 2 e 0 n 0 0 ( p l a n g e W a s t M a n a g e m e n t i C o n t a i n e r s**

I m m e d i a t e l y e t p G i r s d e m s u h a t f e o l l o w i n g i g a t r i e s t o s

- W A C 1 7 3 - 3 0 3 a - d 1 y ( e 2 ) e r 2 e 0 0 0 ( p l a n g e W a s t M a n a g e m e n t  
 w a s i t e o n t a t i h m e t t e s b a s t ' e H a z a W a s t M a n a g e m e n t  
 W a s t A l s a b c o h t a t i d n e e f r t i s m e b r i s k a ( s s s ) o c w i a t t h e d  
 w a s t e e g g n i c a b t e s p i x e t t e c D . e s . t o r r o e y m o l v a b f e r l o s m  
 e m p t o n t a i n e r s .

K e rMrcyN a m a n k P M c N a m a r a  
 D e c e m b e r 0 8  
 Pa g 3 @ 6

111 1 7 3 - 3 0 3 a - 1 1 0 7 y 0 e ( 2 e ) r e 0 0 e - A - & c o n u d la an t g e e w r a o s u i t s e  
 c o n □ at i h a m e r t r e a r k w e i a d a c c u m u l a t r i t o r e d f a i a n t h e d e a t e  
 t h w a s i t f e i r s t t a h b o n d a i n e r .

111 W A C 1 7 3 - 3 0 3 - 2 1 0 0 y ( d f ) e 0 0 3 0 e - 5 K e ( e c p o ) n t a c i l n o e s r e s d  
 e x c w p e a n d d o n g m o w a s g e .

- W A C 1 7 3 - 3 0 3 - 2 1 0 0 y ( d f ) e 0 0 3 0 e - 5 K ( 7 3 ) - 3 0 3 - 3 4 0 ( 3 ) -  
 S e p a r a t e a t a n s d r a m s t i h a e t r e e k l i t n c b e s s p a b e t w e e n  
 r o w a s n s d t h a y e n o o r t e h a w p : 1 c T r h o a s s s s . p a c r e u b e t  
 s u f f t d a e m c o i n t a a t r e s p e a r t a l l o n e s o l f o o t h u e n o b s t r u c t e d  
 m o v e m o e f n e t r s o f n i p r e e b t e c t i o a n s p a u d i n p e a n l t p m e n t .
- e W A C 1 7 3 - 3 0 3 - 2 1 0 0 y ( d f ) e 0 0 3 0 e - 6 j d w a c t k h y p e c t i o n  
 i a l a l r e w a s e d a e n g e w r a o s u i t s e c c u m u l a o t n e t d a M a e n a r a i n .  
 i n s p e l c o t g f i b a t t u k k e a s a e t d i m e n s p e c t t h i e a n d  
 s i g n a t u r e s p e n d o a o t f i h o e b s e r v m a t d i e n t h e d e a a e d  
 n a t a a e o r r e c t i v e m e a s u r e s t a k e n .
- o W A C 1 7 3 - 3 0 3 - 2 1 0 0 y ( d f ) e 0 0 3 0 e - 7 P r ( o d a ) i d d e q u a t e  
 s e c o n d o a n r t y a i f r o m t e a z t a l r w d a o s u t s e h s o t o o r t e s t i f d e e  
 b u i l d i n g .

## 5 .W A C - 1 7 3 - 3 0 3 - 2 0 W A C 1 7 ( 3 b - ) 3 ( 0 1 3 y r ) @ 4 e r D a n g e r o u s W a s M a n a g e m e n t T a n k s

I m e n d i a t e r l e c e p p o n d e n s u h a t f e o l l o w n d g a t r i e e - n s

- W A C 1 7 3 - 3 0 4 3 ) - A 6 n 4 y 0 a ( s t e l a t v e a k e d p r e c i p i n t a t i o n  
 s e c o n d o a n r t y a i f r o m t e a z t a l r w d a o s u t s e t a b k e s m o w e t 2 h 4 i n  
 h o u r s .
- W A C 1 7 3 - 3 0 3 - 6 D 4 a 0 n ( g 5 e ) w ( a d u ) t s e m k u s s b t o r o p l e a r b l e y s e d  
 " d a n g e r o u s h a z a w a s t i t e h . s " i g n a b n e l b t e g a b l e  
 d i s t a n t c e a s i f f e t y t a b e m u s i t e r t h m e a f j y o i r s k u f f i t c o i e n t l y  
 w a r e m p l o y e s g e e n s p o n s e a p r e t h s e o n g n e e n l e , r a l l p u b l i c

- a W A C 1 7 3 - 3 0 3 - ) B 4 0 g 6 w a p b t t s a e s k o r s a y g e t n e u m s t e  
 i n s p e l c o p y e 6 0 4 n 0 ( 6 ) ( d ) .

## 6 .1 7 3 - 3 0 3 - 2 0 0 1 ( y r ) f ( e e r ) e 3 1 2 0 e ( 2 ) - G a n c e r l a t y - I n s p e c t i o n s

W i t t a Q d a y o f e c e t p o r s d e e v e a l n o d p o l a l w o r w i t n e p e s c t h i e o d n u l e  
 f o c u s m i n o g i t e o q r u i i n p g m a f a n t e y m e r g w q w i p m e a u d r e i v t i c e s  
 a n o p e r a t i o n e q s u t i p m c h e u t p h e l a v d e n t t e , c e s p t o n a d z a t r o d s

K e r MrcyN a mænkaRM c N a m a r a  
 D e c e m b e r 0 8  
 P a g e 6

t hpeu bhl ei aod it theen v i r o (nrWAC173 - 3 0 3 - 3 2 0 ) d u s t  
 s p e c i a f d i d r a e l l s y e o a f s h f e a c w H e i t e h a n z a a t r e d n o u s e n a g e d  
 i n c l u d t e o n t g e e e a v a w a g a h r e c a u t - d o w n / a c r o n y a c s t o e r  
 a c c u m u l a t i o n a s o n

M a i n t a i n i n g s p e c i a c o n s u a n t s - 3 0 3 - 3 2 0 ( 2 ) ( d ) .

**7. WAC173 - 3 0 3 a n d y (e3f)e r 2 e 0 n 0 c (e1 9 0 a d a y . A c c u m u l a t i o n**  
 U p o r n e c e f p C i s d e e g d i i n s p o s s i b l y g r a n g e w r a s u t s f e f i w t i e t 9 0 i n  
 d a y s h a e c c u m u l a t i o n t o d n a r a g t e w r a s u t s e e n d d i i n s g p n o u s s a t  
 m a n a g e s t i p u l l a n d s d a e n r i d a c c o r d a t h D e a n g e W a s u t s e  
 R e g u l a t i o n s .

**8. WAC173 - 3 0 3 - 2 0 0 y r 1 e ) f ( e e r ) e 3 3 0 e : r s o n a i n i n g**  
 W i t h l a y s f e c e f p C i s d e p d a n d a i n t a i n i n g e w r a s u t s e a i n i n g  
 p r o g r a m t j r r b e u s t s i n e r g e p e r y a t i o n s .

**9. WAC173 - 3 0 3 - 2 0 0 y r 1 e ) f ( e e r ) e 3 n 4 6 0 8 , 5 0 n d 3 6 0 0 : n t i n g e n c y**  
**P l a n n i n g E m e r g e n c y P r o c e d u r e s**  
 W i t h l a y s f e c e f p C i s d e p , ' a d a d t a e n t t h a c i o m t i n P g l e a m n c d y  
 E m e r g e n c y p r o c e d u r e s e e m s e r g e p e r y a t i o n s .

**1 0. WAC173 - 3 0 3 - 2 4 0 0 :** G a p s a d r a a n t g i e o n a u s t e e a t m e n t ,  
 s t o r a g e d i s p a c i a l i t y .  
 U p o r n e c e f p C i s d e e a s p e e r a t i o n g g e w r a s u t s e e a t s m t e o n r t a g e  
 a n d i s p (oTsSaDla) c u r l i a t s u n t WAC173 - 3 0 a 3 n - d 2 4 0 0 a n d a r d s  
 a r m e C e a s e c e p t b i t t h g a r t n e o " t e m p a t s y e " f i l WAC173 - 3 0 3 - 1 6 0 .

I m m e d i a m p t l e e d p e e n r t p t a c g i n p r e o c e d a e p e s c t t h a r t h e s t  
 " e m p a t s y e " f i l WAC173 - 3 0 3 t h e 6 0 a c r u s i s s h w o c t l i e e  
 i n s p e c t a i s o l m i p m e t t h o f e a c c h e t k o t r o g t e a r t n e o t m p t K P .  
 m u s k t e a p o s g h o w i l n T g h e a m a n s d i g n a f b i e r s p e c D t a o t r e f , 2 . )  
 i n c o n h i n g n e O b t s ; e r v a n t d i a d e n s t y e r m t i h t h e h d i p r h e p m a t r t o f  
 t h s e h i p r m e n s b t e r e j e c t e d .

F o e r a a t e j e s c h t i e p d h K e p m i t s k t e a p e c o o f h f e o l l d w T i h n e g h i p m e n t ' s  
 g e n e r a n t a a r d d r e a s o d n t i a n d t o r n 2 a A t d i e o s n c r o i p h t s a h o i p m e n t  
 b e i r n e g j e 3 . F a d d a l s p o a s n i d t e i s o t n i o n f a h t R e b j r e l c o t a d d d a t o  
 r e l e f a s k e r .

F a i t o o m p w l i y t h t h m a s y e Q i u t d h e t e r i s s a & m p e r l a d o t h e r  
 a c t i w o t n , s e a t d h m e i r n i s f u d t t e v n e f l o t , h t e e r o n f s h o r s d e r .

Y o h a v a e i g h a p p e l a C i s d e a p p e l a y l c o n u s t :

Ker Moy Namark & McNamara  
 December 2008  
 Page 6

- o Fiyləppəwaiit hReo II Cən dHnealr Ba gsd t30d a yost he  
 " da trefe c eoifphfd's cumē n mienagia b t pəd φ ytpheo a rd  
 dur t e g w lf afriocuer s .
- Ser yəappəat hDee p a r t mEecnotl w ig ty30d a yost t") deaotfe  
 re c eoifphfd's cumē s e t vniactea c c o m p b jashyef dh e  
 pro c e d d e e si W A C E 71 - 0 8 - 3" 05aot fe@ c ei idpetf" iante d  
 RCW43 . 2182 0 1

Bes u nt d o hfeo I l o w i n g :

- o In clauφ φyt hd scum e ny fo t hraed p e avli iybgN o t o f e  
 App e al :
- Ser vred iyloea p p e a la p fea reml; e c tcropanieos o at c c e p t e d

#### 1 T of Iyləppəwaiit hReo II Cən dHnealr i B g a r d

Ma a p p e ; : i l : t ( ? : ) D e l i y o e a p p e a p e o s o n

The B o l l Q dn Hnealr Ba gsd  
 P O Box 4 Q 9 0 3 . OR  
 O l y m p i a 9 8 5 0 4 - 0 9 0 3

The B o l l Q dn n o l B h e a r r d i n g s  
 4 2 2 - 6 t Ahv S E R o w S i B k l , d g  
 L a c k W A 9 8 5 0 3

#### 2 T o s e ryœa p p e a t hDee p a r t mEecnotl oofy

Ma a p p e a l D e l i y o e a p p e a p e o s o n

The D e p a r t o m E c o l o g y  
 App e Al pspl i c e R t e i l o n e f OR  
 Coordinato r  
 P O S - 4 X 6 0 8  
 O l y m p i a 9 8 5 0 4 - 7 6 0 8

The D e p a r t o m E c n o t l o g y  
 App e Al pspl i c e R t e i l o n e f r d i n a t  
 3 0 0 D e \$ m D o S E ; I  
 L a c k W A 9 8 5 0 3

#### A n d s e n c b poyf o u a p p e a l :

D e W i l l i a m s  
 D e p a r t o m E c n o t l o g y  
 Sout h R e g i o n a l i c e  
 P O B o 4 x 7 7 7 5  
 O l y m p i a 9 8 5 0 4

F o a r d o b i a l n f o r m a n H e n o h i r o n H m e a n r t O a r f i g W e l s i t e :  
[h t t p : / / h w a y . g o v](http://hway.gov)

T o f i h a v e s a l g e n r a y l v e i s t h M a s h i n S g t t a b t æ g i s W a b s i e e :  
[h t t p : / / w w w . l e g . w a . g o v / C o d e R e v i s e r](http://www.leg.wa.gov/CodeReviser)

Kermy Namak FM Namara  
December 2008  
Page 6

You are requested to file this document at your earliest convenience.  
Submitted by RCM 3.218.320

DATED 3rd day of 2008 in Washington, D.C.

K Seiler

K Seiler  
Manager  
Hazardous Waste Response Program  
Southwest Office

STATE OF WASHINGTON -  
DEPARTMENT OF ECOLOGY.

IN THE MATTER OF PENAL  
ASSESSMENT AND INSTITUTION  
- Merrymo Namara  
KNPc Namara

NOTICE OF PAYMENT  
INCURRED DUE  
NQD E6 229

To : Mr Keir McCarthy and his wife and personal family  
39 Thamien  
Clevetham 4441, 14

F o r h s e i l t æ c a t t e d  
5 0 S E M a r i A v # 5  
V a n c o u V e r B C V 8 6 6 1  
R C R A # W 0 0 0 1 0 6 0 3

No t i g e vtehnla hDee p a r t n e r E t(dDieopgayr It anesnste)s a p e d a l t y  
a g a i y ro s u t haem o uon\$ t2 0 ,f0o0r0 o l aC hi aop7t0eo.mR C V@5t hse i □ e.  
k n o w @K RM c N a m b a r a a t k @ B M a r i A v i #5V,a n c dMVAv9e8r6 6 1 .

The **n**a **b**ay **s**o **nd** hfeo || D **w**p **a**g f **m**ed t **ng**s :

- WAC1 73 - 303 F141 (12s) exp for other protection under statehoods where nondisruptive ed-eosinylgum�ewaste must - off-state factors including population pressure, pollution, and environmental degradation, as well as site selection for new facilities. EPA / STtraatnes provide information on receiving sites for new waste.

1 7 3 - 3 0a3n-e24800a:i I u roe a f a c n r a it t o o m pWl y t h e  
r e q u i r e m o r p h e t r s a a t d a m g e w a s t e e a t s m t e o n r t a a n g d e  
d i s p o s s i t a) c i K P a t c y c . e p o e f s o m g g f n f e r s h t e s s .  
t o t w e e s m o t " e a n s t e y ' l i W A 6 1 7 . 3 . 0 3 - 1 6 0 0 2 n ) t , a i n e d  
□ i g n i a f m i o c u a n f t s n i e z a b i t n a e z l a y r a d n o t u s d a c g e w r a o s u t s e  
K P o p e r a s a e u d p e r r d a t g e v t a o s u t s e e a t s m t e o n r t a a n g d e  
d i s p o a s c a w l H e i r a t y c e p h t e o d t c o s t a d i a m i g n . E a , e f t f O L i s

The penailstuya npa y albyew i t b h m(r3tdaya yosy o ue c e f p t s  
Notice.

P l e a s e s t i c h p e a y m e n t  
D e p a r t m e n t o f g y  
C a s h i l e n i n g  
P O B o 4 7 6 1 1  
O l y m p i a 9 8 5 0 4 - 7 6 1 1

KRMcNamara  
December 2008  
Page 5

Yob a vtærei gis tuban App i cfaorRed if Eco logy. I bævtæ  
ri gis App etahl. ipse nt at ihrey i lundin thecal Bog isndmed wættibyt  
exerct ihsep hagf in li iAppgønl i fære ito Eco logy.

I yofuialte mæplyl i fære il tæco lwoigtythi in 30 yosf ou eceipt  
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App i cærei b iYeow. i'tl Hæna vær i ghat ppæEclo lonytæde  
Dispolsp dAppgønl i cærei b iPæoolrlut ion CBoardl Hearings

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To App etahInne t bæfe e nyolntuys t :

- F' yid æpp wæt he Pælo lnHærcolnBægwidt3hQl a yosf he  
" < oJfætcæo if phdiðcumæn hñienaga st ræd e ytphæo ar d  
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- S erwæa ppe at hDæpar bænto lwoigtyt hQl a yosf he d date  
- re coefi tæbætsu mærit mædæ , a c c o r p a l y f hæd  
pro q e d d e s bWACBædl - 08 - 30 5otfee(c)e. id þe ff'antiesd  
RCW 3.B2.10(021)

Bæutæd hfeo l lowing :

- In clæd æpp yNeotæ Ben at hæta ræp p e awli it rhN y bæfe  
App E : a l .
- S eravæd lyloeu r . a p p æfætrem ; e c t o p a ensoatc c . e p t e d .

KRMcNamara  
December 2008  
Page 5

**1 To whom you want to file or to whom to forward**

Maple Leaf:

Delivery address

The Pollution Control Board  
PO Box 40903  
Olympia WA 98504 - 0903

The Pollution Control Board  
422-4614 v SEROWEB Sliding,  
Lacey WA 98503

**2 To whom you want to forward**

Maple Leaf:

Delivery address

The Department of Ecology  
Appeals & Alternative  
Coordinator  
PO Box 47608  
Olympia WA 98504 - 7608

The Department of Ecology  
Appeals & Alternative  
Coordinator  
300 Desmond Street  
Lacey WA 98503

**3. A signed copy of your petition:**

Dewitt Williams  
Department of Ecology  
South Region Office  
PO Box 7775  
Olympia WA 98504

For additional information:  
<http://www.ehohawaii.gov/>

To find what agency issued the machine safety standards:  
<http://wfa.lgwow/CeodleRevisor>

DATE filed 3 day of 1)  2008 Olympia WA 98504

K Seiber  
K Seiber  
Hazardous Waste Reduction Program  
State of Washington

KPMcNamara  
December 8  
Page 5

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

IN THE MATTER OF PENALTY )  
ASSESSMENT AGAINST )  
MrKerryMcNamara )  
KPMcNamara

NOTICE OF PENALTY  
INCURRED DUE  
No. 6229

To : Department of Ecology  
State of Washington  
South Hill Woods State Park  
PO Box 47775  
Olympia WA 98504 - , 7775

KPMcNamara & Kerry (Kerry Mc Namara plan it's own arrest) is ordered  
"NOTICE OF PENALTY" PURSUANT TO EWC 15.20.010  
Kerry McNamara will be liable for a fine of \$200,000.

I have reviewed the above and find it is true to the best of my knowledge and belief.  
I declare under penalty of perjury that the foregoing is true and correct.  
I declare under penalty of perjury that I am not a party to this proceeding.

K R M c N a m a r a  
D e c e m b e r 0 8  
P a g e 5

I s w e t a h t f e o r e g a t i n g e a i n d o m p \$ e a t e c o n f e n t c t s i c l a s s e .

B y - - - - -

T i t l e - - - - -

S U B S C R I B E D W O R N b e f t h \_ e s d a y f - - - - - 2 0 0 -

N O T A R Y U B L I C a t r h S e t a o M e a s h i n g t o

M y c o m m i s s a p o r e s : - - - - " " - - - - -

R C W 0 A . 7 2 P . e 0 r 3 j 0 u h s p e c o d r e d r e e .

( 1 ) A p e r s s o n o l p t e y r j u h s p e c o d r e d r i v e i t i n t t e n i t s l a e a d  
p u b l i c r v a t r h t i e n r f o r m h a i d s o t y n o f k e n s a t e r f a a s t h a y t e m e n t ,  
w h i h c k n o w s e f a l s n d a e r a t b e q u o i a r u t h o b r y l i a v e d

( 2 ) P e r j u h y e s c e c o n d e l a c f s e l o n y .

[ 1 9 1 7 s e t x c 3 6 0 e 0 A . 7 2 . 0 3 0 ]





**STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY**  
**P O Box 47700 S I y m b a h i 9 8 5 0 4 : ( 3 0 0 ) 7 - 6 3 0 0**

Aug 28, 2007

**CERTIFIED MAIL**  
**70007 10004 22506377**

Mr. J. Hughe s  
 KPMcNamara  
 505 Bremar i At v i e s - B  
 Vancouver BC V6B 6G1

Re: Immediation Request Muc iNaenda r a , WAnco u ver  
 RCRADWAH 000025256

Mr. Hughe s :

Thay & fuoyot i m Aug 12 0 07 Aug 12 0 0 A s y o k u n o w , i s K R e d ! V i c N a d a t a r t n i c e a r p a l n e y w s b m p l w à t h e t a D a n g e W a s t e R e g u l a WA C 0 3 - 3 0 3 ) .

Wh iolne- smiyd @ -, i n s p e c t o r l e s c a t n e p l f ewea sat aec u m u i l k a P t e d Mc Namairna- 'gss a m Wed e t e r m i n h a t s e u m p - v h a s p l 1 4 w , h i c h d e s i g n a s t e a s o r d a o n g e w e a s u t h e r . o u t g h t i t o a t t e a t n i t o l m e i n s p e a c t d i o y m o d u i t h a y d o u i l d m e d i r a t h e t h y e a s f t r e d r h e o n c r e t e s u m p .

The a n g e W a s t e R e g u l a t o r i e s f o r s t a n d t a h m a d u s s t e n e w h e n d a n g e r w a s s e a c c u m u l a t i o n c o n d o a n r t y a i o n f r e a n k t d e n e d t a s i q u r e s t i o n a b l e a b i t l b i a t n y d i g H w a s t e s .

KPMcNamara I a t t e a d s it a n d d a e r f d i s i n WA C 1 7 3 - 3 0 3 - 2 0 0 W A C ( b ) ( i i 1 7 3 - 3 0 3 ( 5 a ) n D ( 6 4 ) ) r e f e r t h e e e f f o r o e l , l o w i n g u s b t e t a i k o n i s : ,

1. I m m e d i u a p t o e n d y e t p l e s t c t e a n s , s e i t n h g e a s y s t e m i n s l t u h d e e s s u m p s v e a d s t h e o n c f r e d t e n h c d n v w e a y s t t d e h s e u m p T h s y s t e m c a n b e u t s e t d b o n v e y c c u m u l a t e w a d s a t h y f e u o t u i s t a b l e , p o s s i b l e t a s t h e s y s t e m a n a g o e n - d a n g a e s t h e u s e p e r i p e t u i t h a i s e g , KPMcNamara s a t e t e r i n d a m g e w r a o s a t s f e t c h t s e y s t e m f e g r i t y .
2. W i t h w a n t h y o u o f s u e r c e t p l s ( h e a t r e a c h y o m p l r i e s m h o e v d e ) , d a n g e r w a o s u f t s e d r h t e a s y s t e m l a i d e a t p o p r o p o n i a a ( e t n o e t r e s s d r u m T s h ) e s e n t a m i u n s t e m a n a g e e t h c e o n t a i n e r s t i a m d a r d s W A C 1 7 3 - 3 0 3 h 6 3 Obme a s it kae'sdc o r r d a s n i g v e r a o s u p s e n d f i u n l g l d e s i g n T a t e m y u s h a v a e o r r o a b a n d u s b t e n a r k w e i d t h d e a t " e A u g u s t 1 6 2 , 0 0 7 The o n t a i n e e k s p h o s t e d w p e a n d d o m o w a s g e d

Mr.J.eHufghes  
Aug 2007  
Page 2

3. mustes to ir ~~en~~ r wa st e co ncdoanryta i h in ~~co~~ m p l ae ft hiwicnr k ,  
con træt e ptohretb I onfia srtæm o f e d rhsey s t em .
4. Wit h in r t y p (3e0c)e f p l es t dt eecro, n t at nh te a s k s t A mmy e s i d u e  
( w aw s a nt g e n e rbayt eed o n t a m h te aast k i sntg e n b t o pae c r l uym u l a t e d  
a nd e s i g a n s t e q d i W AeC1 7 3 - 3 0 N O t m e a g e a svba y s i o r t o  
s t a rt th w a gskd c abn e r e saen ob s er ve w ork .
5. Wit h in doafyesc e f p l es ta tned if t e e a tn hisey gs teevma, l u at t a en k t h e  
s y s t e m t e ri nfa z a rcdoonuss t w e u r en l test a s leeh v i r o Th m e s t .  
e v a l u a u t s n e o r t h c e l o spu e m e o rsmt a m o d e a r d i s W AdC1 7 3 a 8 0 3 - 6 1 0 ( 2  
P l e a s e t o heen c l G s e d a f o r e C l e s o n D r a e n g e W a s t e c i l i t i e s  
( P u b l i c a t i o n # 9 4 - 1 1 1 ) .
6. Wit h in t y 4 & a y s e c e f p l es t ftuedre , s i g t h seut n e p - va an s h e  
w a sgtæn e rbayt eed o n t a m h te aast k i sntg e hnd e s i g m a s n f e c e n t h e  
r e q u i r e W h A e C1 7 3 - 3 0 a n n Du7s0n, c la uedvea l uoaf toixoana d t y  
p e r s i a s t e n f d i a W h A e C1 7 3 - 3 0 N Q T E B a s e d E c o l ofgiy e t h s d t h e  
s u m p - w a a s t e e s i g n t a t e c b r r o d s a i n g e e w a s t a r R W g s t e  
C o d D e 0 0 E u r t d h e e s r i g n i a n t e i c d h e e d t e r m a f i n n y e t h f e e r d e n s a t l a t e  
w a s t e d e p p l y .
7. Wit h in t y 6 0 & y s e c e f p l es t p t reorva w d e t e p t a F d o lwohgiyc h  
i n c l a d e e s s c r o i p h t e a a n k s t e m r s t r u f c x a r a p h l h s e i . z , e / d i o m f e n s i o n  
t h s e y s t j e o m , p t f i g p u r p a t n o t p h i , e n r t p g a r o a t f l s t e a s k s t A m h \$ o  
p r o v t i h d e e s a f t h e e v a l u a n t c i l o n e l , f e a g g e m o y b s e p v e d \$ e r a t s  
c r a g k e s a t h a n 0 1 - p i n t o h , m p d e s b , b d o t h g a n r o m a i l t i h e e s n c r e t e .  
T h i s i n w o b h a n s a e d d e t h e ri n f a z a rcdoonuss t ic b u h d a t h e e s e n  
r e l e t a s e o d g r o u n d w a t e r .
8. B y N o v e m b e r , 0 0 m 7 a , n i f e s t u n p f - f v a a s t t y e a s g t æ n e r b a y t e d  
de c o n t a m h te a a s t k i sntg e t a m i n i n t h s e y m p - w a s b t e a m a g e s t d  
c o r r d a n g e w r a s u t s e r r E y P i A n g W a s t e C o d e D 0 0 2 m a g O l t s h o e r w a  
a p p R y o v a i c o y f h m e a n i t f e s d l o g y i ( w e l ) a h o i s n h d e a t h w a s t e  
i n s a n i f e s t e s i t e .

T h e b o a r e t i m o r b e t a k w e i n t h h i p e r e s c t r i m b e l l i n e a s s e a m a c t f t h e i r s e  
c o n c e r n a b o u t d e n a e d t i a n i e g d a t t e s e o n c i f u l r d m a l e s u l t  
e n f o r c i e m n e l n a t p d e i m a g l t y i t s h a e z d a r W a d u l t s e n a g e A n a c t R C W  
7 0 . 1 0 a n 0 0 8 9 6 5 f i p t \$ 1 0 , p 0 e d r a p e v r i o l a t i o n .

I h a v e e v o r t a c k o m c a b p h a o t w a s t a e b e i m g n a g K M c N a m a t h a s e  
i s s w e b s e d d r e i s a C e o d m p l R e p o t t b l e f l o r w a t r y d o a u h n e e a u t u r e .  
W i t h o u r ( t l e e a n p s l , e p s e v t h f e e l l b o w f o g m a i t c i b l e l t p m p t b e e  
r e p o r t :

<sup>11</sup> C o p o a s h a n i f a e n k t f l a d f o d g a n g e w r a s u t s e s o n - h a z w a r s d t o e u s s  
t h w a t m a n a g e d f s d r a e u 2 a 0 r 0 t h r o A u g g h 2 0 0 7 .

<sup>11</sup> A n d e s i g n a f o r m a t h w e a s t h a t b e e n r a n a g e d f - P s l i e t a e s . e  
i n c b w f o e s a y n a l y e s a v a l s t r e fo i o l t h s e e r t i n e a t m a t i o n .

Mr. J. e H u f g h e s  
A u g u s t 2 8 , 2 0 0 7  
P a g e

- A p r o f c l e a n i n g g r e a t h o m o n a t e m r a i n a l g e f m r e d r i t w e a s a h r e t a , h e w a t e r r / a s m a n d , a c a l g a i n d i w c h a e t t e h r e a v a t e r r e - i d s e l t o h e r e d p r i m a n s y e c o n n i a n s t y e t a i m o t h n s c , b u t o e n s s t r u m e n t s a l o n s , b a s k e t a l f a i r e n t s e , e s e r a .
- A s i p t l e a h o w t i h l e o c a t i v o n l o a p r e n d o c e s s s e t c a m d o n r t y a i n m e n t b e r n i s t j a b t l o e d , e m p r e d s a n g r e w a o s u t s e c u m u a \_ r l e a t o b l i e n r t e g r a l e q u i p m e n t h f e a r e a l s i t y .

Iw o u l l d t i d t e t e g h a e b t o i v r e f o r m i a t t d i o t s h p e e r e t p i o d r n i t w c i b l e f l o r w a r d e d t g o i u t h n e e a u t W n e t h e x p e b k F M c N a m a d r n a m e d b a t g n e h e y t i n g t h L e a r Q u e a n G e i n t e y r ( a L t Q o S r t ) a n d l a e , f r i i d W A C I 7 3 - 3 0 3 s e q u i r e m e n t s a r g e e n e d a s t b y i n t h e e r d c l Q s e R d e k f e r G e u n i d d e D r a n g e W a s i t e G e n e r a t o r s i n a l t a b d E c g o h l o w g y i a t t e t t p : / / w w w . e c y . w

P l e a s e m a e s 6 0 / 4 0 0 a 6 8 4 6 1 @ e a y o h w a a g p w e s t a b o n s t h r e e g u l a t h a e n t s i r , e q s i b i y r l d n s m e d A i c a t t l i e s h t l e o d t r w a r d w o r k w i n t g h q u i u a k t b y t e h s e o e n c e r n s .

S i n c e r e l y ,

J f t , . J j I □ Y V □ □

D e a R W i l l i a n s p e c t o r  
H a z a r d M a s s a s T o x R e d u d P t r i o g n r a m  
S o u t h R w e e g s i t O n a d e

c c : D o u l g i s C e i , d V a n c o W i a v t e r e s o P r o c e d P r o t o g r a m

E n c l o s u r e s :

D a n g e W a s s e R e g u l a W A C I 3 - 3 0 3 )  
G u i d a f m C a l e e C a l n o s o u D r a e n g e W a s s e c i l i t i e s  
Q u i R e k f e r G e u n i d d e D r a n g e W a s s e G e n e r a t o r s





**S T A T E O F W A S H I N G T O N  
D E P A R T M E N T O F E C O L O G Y**

P O B o 4 7 7 7 5 / y m W a s h i n g t o n - 7 3 0 0 7 - 6 3 0 0

O c t o b e r , 0 0 8

**C E R T I F I C A T E**  
**7 0 0 8 6 4 5 0 0 0 6 1 7 5 5 2 6 0**

M r K e n N a m a r a  
K R M c N a m a r a  
3 9 7 H a m i l t o n A v e n u e  
C l e v e l a n d , 1 4

**R E I m m e d i a c a t t R e e q u a k E M d N a m a 0 3 E M a r i t i n B e l 5 A g v # 8 . . .  
V a n c o w a s 8 6 R C R A D # A H 0 0 0 2 5 5 6**

D e a M r M c N a m a r a :

A s y o k u n o t h D e e p a r t m e n t ( o E g c y o b o g y ) u a c n i t r e s p e c t K t M o N a m a r a ' s  
V a n c o u v e r D o c t y 8 b 2 e 0 r 0 & t t h a m E c o l o o b g s y e s e e d r i a l l o f h e n s  
S t a D e h g e V a s u s e g u l a W A C h 3 - 3 A 0 1 8 h s p e c e t p a o n t o t a f e  
V i o l a t s o n w a t r y o u n D o c t o b e r , 0 0 8 .

A f o l l o w s p r e c a t i o n d u o c t o b e r , 0 0 8 r t h e e n c l o s e d 1 7 0 , 2 0 0 0 e r  
I n s p e c t i o n ( n t ) e r r a n c e D u t c h m a i n t h a i s t s i p s e t t e d d h a t t o n e l , o g y  
E c o l o o b g s y e s e e d r o a t h e d n t a s s i n g d i a f m i o c u n f t e s i M r D e u t c h m a n  
i n d i t l a t h e e t s o h e a d e c e a n r t r l o y s e i a t r e d o u b l e d l e a o u e d c o l o g y  
o b s e s s e d r i a n l i d t ( o v s i s h g a i a f m i o c u n f t e s i d d u r e i i ) o g t o 8 b 2 e 0 r 0 8  
i n s p e c t i o n .

E c o l e v g a y l u t d t t e e x d o f h p e n y o d r u e c t i d h u e s r a e c e p k E M d N a m a r a .  
S e v e r o a t c l e s t a n i o m e d h a z a r d b u s t e v r e s t s h i ( l u s 0 a ) p p e a t o e d t a i n  
e x t r a h a e l a y o d r o u t s o n g e w r a o s u t t e s w e s s e t o w e t h p o w p r i l l  
c o n t a r b o d a g e r a d v e - w a y .

KIPV J c N a m a r a s a d d e a t s n t e o n r t a n g d e i s p o 3 8 1 D a c w h e i n a c c e p t e d  
t o t t e h s a e m e ' t e m p a g l e f i i n W e A d C 1 7 3 - 3 0 1 K P v 1 6 0 W A t G 1 7 3 - 3 0 3 - 9 5 0  
b y o p e r a t a t i n g i t h f o u n t a i a p e n g h a t c e t p r o a d t i s p o f s e  
d a n g e r w a s t e h v . s o l n a u t s h e n c o r a r s f e c t l e a d w s :

- 1 . i m m e d i a t e p l b i t e g a r n e d t e m p t d y e " f i a h W A C 1 7 3 - 3 0 3 - 1 6 0 .
- 2 . W i t h w i d m a y s e c e f p l t e s t i t n e v r e , a t t o r n y s o u l t s i d e t a m b i n e  
w h i t c h t c o n t a v i o n g a l d b a n g e w r a o s u t t e s i d h u e s e t t e m u s t e  
m o v e d a r r a s t e c o n d o a n r t y a i T h m e a y n s t e k e p t o a e b a b a l s e d  
" w a p e a d d i e n s g i g n a t i l o g a t h o " t e b r e n u a s t k e w i l s a k b e t b x i c ,  
c o r r o i g i n v i a b i t f r e i o s k i t s n o W h i t h i r e a p s e c e f p l t e s t t e r ,  
p r o v a c d o y f h i e n v e t b o o y a o n g o h o d t o o c u m e n t s a h t o t i w o r d n -  
" e m p t o y t a e s e i p n r g o p r e a n l a y g e d .



MrKerry McNamara  
Oct 26, 2008  
Page 2

3. With the industry trying to fit into the new regulations - even though they are not yet finalized - it is important to understand the changes in the regulations and how they will affect the industry. It is also important to understand the potential impact of the new regulations on the industry and to take steps to mitigate those impacts.

Karen McNamara is pleased to lead the team of experts who will review the proposed regulations and provide recommendations to the agency. She has extensive experience in environmental regulation and has been involved in the development of regulations for many years. Her expertise and knowledge will be invaluable in ensuring that the regulations are effective and fair for all stakeholders.

Consequently, Karen McNamara is available to answer your questions and provide guidance on the proposed regulations.

Sincerely,

**p**   
Dear Sirs, Inspector  
Hazardous Waste Reduction Program  
Southwest Office

Enclosure(s) | Reopened

cc : Brian Tracy, Environmental Services Division, NOAA (brian.tracy@noaa.gov)  
Dawn Givens, Director of Programs, Environmental Protection Agency (Dawn.Givens@epa.gov)  
Karen McNamara, Director of Programs, Environmental Protection Agency (Karen.McNamara@epa.gov)

Fac Name: <b>KPMC NAMARA</b>	Fac Type: <b>QG</b>	PAGE 1 of
EPACRAD#: <b>WAH0002856</b>	InspeCattion: <b>10/17/08</b>	
SiGentact: <b>Terr Duhman, (953)77a-30</b>	InspeName(s): <b>ED8eW ill SWRQ, HWTR</b>	
Address: City: Zip: <b>50 SEMariAire Bel, 58 tE, Vancouver WA 8661</b>	Focus Empilannscpection <b>Focus Empilannscpection</b>	

Phot task(emirg e): Sample

Note(s) (audiosig eianspected):

I con t aBcr tehnoltr g eanfs oChr e e k s i d e ( KPMC Nia mcaocare'sst tadi ia si dEu so sl o g  
I e ta tne dpo t o V e o l a N O wghd A h b e t t ewra/sNeOvK RM c N a mca R a t o 1b62,0 0 8  
a n d a s o r : h a n d e kEsn ivdier o ranMecrNtaamlaargae'nst .

Wh ioln hpeh o M e J, o r g e innsdo int la t h e b n - e tmop t t y d o I porgeyv iobus se loyt he  
s i ht aed e er ne mo ar etla kteona co mla. I s p d i t la k a M d N a mna ar h a p u r c hbays e d  
Qu aW a s H f h s a t w e nt h r o tuh g l a n g ewr a o suctuer r se in ttolny in tgœu l d a b a g e d  
t h r QuugaW a s h .

Is p o w k i e f h aDn iko k hCei d V a n c o l u n d e u W a s t a P a b g a l a n u t W a u s a H e l  
i n d i c a t e d W a s who upl rdo b r a d e a p e r m o d i f it o a t s n i q l u i p o n e a t ,  
a c c e p n e w a s s t e r e T a h m p e r m p t b i c o g s t l a d k p t e imx o n t h s .

I r e l a t y e i d s f o r m a it ej oot g e h s o a n h u n d e r s a h a b c o a r t i h f a t t e d t e s i d u  
h a d oytebte esrh i pop se fidft re KPMC N a m a t r a M d o r g e t h s a c t n u g i s ( W a R e s o u c e  
P r o t e P c r t o i ' o g n a m y o u i t h s e i lt æ f a l d e a y .

D o W g i s a e n b a r r i v e d a D a 15 s a n d t e r o d u c e d M D u r t s e n W e a l k e d - t h r  
t h f e a c a r d t o b t lef o v l e l d o w ! n g :

#### OUTSIDER AGE

- Th ewæs is e v et ro ab kCh r ovmai sxt e , ( pdreet ve ir a n b s m l e y d - h a z M r D. o t u s h m a n  
i n d i c a t h e t soeth a dju as rt r iAv tle dæ s t g h f h t e o t a e p s e a b e a d b o o n t e - f h u a l l f .  
Th ewæs n t o tt h e a t d o l l a p a s e d c o m b h w a t s p o c o n d iNt o r e h e t a d h e s  
g raw e b o s e a v e d h t e o t e s .
- Se v ee map ltt y tperse, v . c i o n u t s a i s y t y m g e n e a s t i l r a d e d e r e l i i W e e n o d a e s t r o n g  
s t y ro ed n o e a h t e o t M r D. u t c h s m a f h d t e o t h e a d e c e a n r t r l a y n d e o u n l o d t u t t h u n p  
b e c a t u s e y e l b l a e d d .
- Th e i o n - te o p t s y e o n e O c & D o w e is e o i n d i t t h e t s e t w e s f o u t n o d o n t a i n  
e x t r a h a e z l a y o d s o t u a s t e o o d n a l o y g ewr a o s u t t h e ewr e s e v e n e a b n - e tmop t t y s  
s i t t h e t s e t ( el sa baestl o x Piep, slænt b' a ) s o n t a a s i n g d i a f m i o u a n f t e s i ( d t p e -  
i n c h a e t s e ) a t sv d f h t e o t w e s o p e ( p e r h a p s i a l id nt y a t f e lgree s i d h e wæs  
s t r o a t g h a l e d e t h a e r e a l l o n - e tmop t t y s m e r k a e n d o t i e t d a b a l e .
- Ke rMrcyN a m a r a t M r D. e t l c h u n h a i m l a e e r c o n d u c t i r i n n g p e M t D i u o t n c . h t m o M n  
M c N a m a t h a d d w a a y s i l s a d s a t y t . h e p o w k i e M h M c N a m a r a x p r e E s c o e l d c g y b s e  
a b o o u o n - e tmop t t y s p l a t h a t h e t s o e t e s n o b t r u e l m d o f e d h s e i w t i e t h p o w p e r  
d e s i g n M a r M c N a m a r a h a u n d e r s t o o d .

K R M c N a m(a l r a s p N o c t t e i s )  
O c t o b e r , 0 0 8

P a g e 2

- J o h n z z w i l l i a n d a t y w i a e l r k s e d i n w l a e e r c o n d u t c h i e n s g e f t h t i a l g e g i n g  
t o t h e s s a h i v a n t t o d t r b d m s e a d s k f e a b u s . c a t h e i s n d i t l a i w t a d s  
p o s s t i h a l u t e a l a m W a g a h t q u K R M c N a m a m a s . k a b d o E u c t o l c g y n c s K R s  
M c N a m a m a x p l a t h a t t o e s t o d e m p w h e t n h a y r i v s e i d f h o l n e w e t r h e e d  
p o t e n t f a u m a s a d n s d h e t h v e i r o a n m a l n a t o i r d e e g d u l a a t d a o n g e w r a o s u t s e  
t r e a t s m t e o n r a t a n g l e s p f o a s c a i l p d i t r y t o e n d f h e o t p e t s h i c d n t a a b r o s u d x  
i n c a b e s s i b s u a l h t e o d e n t a w a e t h e a t o x a i n d h t e o n t e e d t e b d e m p t l y o f f e r  
t h a t t e o n t e e d t e o d b n b a n D y 30% f t c h a e p a (c t i h t a y b o l u g t a l o l w o a n s t N e O ) T E o n e n c h  
o f e s i i d B 0 0 - g t a o l t l o o q n a l a d 5 s . t 6 a l l o n s .
- T h r e o n - e t m o p t w y s s e i t a t b i o n g i e a w e r i b e c o n c o a n r t y a i T h m s e a n h t e d a i t e  
m a n a g t i h w e g s o t f i w t a e s o k t n o w n .

### I N S I D E R E H O U S E

- T h e w r e e s e v e m p t t o y t i e n s t i h w e a r e h a n d e u g h o l f y u o l t d e s i n s e ( w t a o t x e i r c  
d a n g e w r a o s t h e r D u t c h s m a i n d @ @ l b o f r a s t e b e h a n d m p o e u t f h p e r o c t e a s n k s  
y e s t e a r l d o a n y g t h w e a s f t r e d r e t n o t T e h s w a s w t e e t M R R R o r t l a n d .
- W e p H t e s t t h e l e l i q a u c i c d u m u i l t a h t e a s t h r e n T d h e i n s e i w t a h r t e e t c a a l t c h a p a l h b  
f o u M r r D u t c h d m i a d o k t n o w h y h p e l h w a s o W h p H b n t h s e o a p a t c h w a p s a m T e h . p H b  
t h r e i n s e n e a h p e o r l a n w k a s s i g h t .
- T h e w r a e s i q u o n t i h d e g n r e a u m n b e f t d h a e n g e w r a o s u t s e t N e s D u t c h s m a i n d a s o w e r  
w a s w h a t l e s . a f h w e a s t t o e w e s r e l e a o k t i n g .

W e c o n c l o u d r e s p e a c t d e t f h s e i t e a t i e t h d e a y c o n t a r K e n o G r e e k s i d e  
E n v i r o n h e x p t l a t h t e a d a r k a e b d f h t e o t t e a t e d b e s e a r l u a t a i p p e a t o n e e y  
c o n t a i n t a r m d a t u e s r l t a h e t d l a r t k h n e o n - e t m o p t t d y a d n t a n i m e d h a z c a h r e d h o . u i s c a  
( f e o x r a m p t h e o n E l o x ) e n a b t h t e o y t i e t s e t o r y a g n e t d b e v a l u t a t e e t r i n t h e g  
a r e e m p t A y n t o t t e a i s t o e t m p r t a y e t d b s e r e t u t r o n h e g e n e r o a i t h o e a s i t h . h e e n t e a e t d e  
b e d e s i g n a f t h d e e d s . i g s a l a d w e i n i t t h a z t a r t l o t h e e n t t i o n t e i t a s i n d e e t b e  
s h i p t p a e t S o p r o c e ( s b s u l a g i d n i g p o s a l ) .

I e x p l a t h k E M d c N a m a o r t a e s d t r e a t s m t e o n r a t a n g l e s p ( o T s S a l a ) c f i d d r a h y g e w r a o s u t s e  
b y a c c e p t h n e o n g - e m p t Y h i t s o t o e n s u b n i l t e s d y e t h T e S Q t a n d ( p r e d s m i t t i n g ,  
T h e o m p w a y f l u d r a b a t s a r t S Q t f h e y t b d c k e m i f c o d a r l s p o s a l ( d f r a r i n e x d a m  
r e s i o d u a t b o t f e d s r i s p o t s h a i l a ) l s o o h i u b n i l t e s d y e t h T e S Q t a n d a r d s .

I a s k E r d f a e l t a n y i n s f o r t h M c i N t a i m o d a r l a a s e k t e h a d o l b o d g e y p i t l h l e o o p  
c o n c e t r h p e o n t g e s n a t d i t h b e u s i s e o s e s q u k l n d o w h b e p e v a i k a b o o u t r o n c a t h e  
s i t t h i s f o r m a s t o n n u n i i d h a s t e a n d t e a b y y e - m a t E r B n j n o t r g e a n n s o r n .  
M c N a m a r a .

T a b l e A o n N a m e t t e s

T o t e	D e s c r i p t i o n
1 2	M a r k ' E l B u l T t e o x i r ' e i v t y e w o d u h c t w s o u b l e d o x d a c g e w r a o s u t s e B e t w e a n n d . : . o i a n r e e n s r / e b s l i u d e u e .
3	M a r k ' E d u n a A s h o o t l ' n a c f h e s s i d u e .
4	U n m a c r d r e t d a b n o u r t i n a c f h e s s i d u e .
5	O b s e r v e d / 8 M @ 8 K ' E d u s t a o x i r ' e i v t y e w o d u c f i w t s u b b e d s e x t r e m a e l a v d o u A s b o u a i t s t e i o n f c h e l e s o w r e s a d u e .
6	O b s e r v e d U m m a s c k o u r t w i s h e t s o i t h a k e A b i d l - t . f u l l .
A M	M a r k ' E p d e p t s y i p t e " n d l V a r y a m o g u o n f e s b d e t e v e a n n d - i n S t e r s o n g n a t h a d b o T r e b o t p s e n l o d a n t e o w t i t t e a k a l v e .
N - P	O b s e r v e d / 8 M @ 8 K ' E l B u l T t e o x i r ' e i v t y e w o d u h c t w s o u b l e d t o x d a c a e w r a o s u t s e t w e a n n d - i n c f r e e s e n r / e b s l i u d e u e .

T h e b o t w e s t e s l a b w i h e d t n o u t r e b a e n n d s ' w a s e s d d i e n s i g n a d o i D R W 0 8 ,



STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

PO Box 47775, Olympia, Washington 98504-7750 | 360-6300

Oct 01b62, 008

## CERTIFICATE

700364 5000 0617 5352 53

Mr. K. McNamara  
 KP McNamara  
 3972am i Avenue  
 Cleveland, 114

RE: Complaint against PM on Namátsi Mari Atvised # 85,  
 Vancouver, BC V6B 2E0  
 RCRADWA H002256 ER T#S608877

Dear Mr. McNamara:

The Department received a complaint against you regarding Namátsi Mari at 85, 3972am i Avenue, Vancouver, BC V6B 2E0. The complaint concerns a recent occurrence - was at approximately 11:00 AM on October 1, 2014. The complainant is a resident of the city's complaints. The complainant states that the facility is located in the vicinity of the facility.

A number of observations were made during the inspection, including:

- WA C173 - 3032-0000630: Inspectors found signs of damage to the building, including cracks in the roof and walls, and debris on the ground. The building appears to be in poor condition.
- WA C173 - 3032-0000630: Inspectors found evidence of rodent infestation, including droppings and tracks. The building appears to be in poor condition.

The inspection is conducted by the state of Washington, and the results will be used to determine if further action is required. The inspection is conducted by the state of Washington, and the results will be used to determine if further action is required.

M rK e rMrcyN a m a r a  
Oct o1b680 0 8  
Page 2

E c o l o g y b a m e t r c u r r y - w a s t e i s n o g h t r e a t h i g h p e c t i o n .  
H o w e v e r , q u e s t i o n s a t i ( y c o i n s p a t e h r e e d e f i n i t i o n i n i t l y ) d e d  
w i t h t h e s p o s e m p l i a n c e P l u e i a o s t a t e a t i c o f t h e n p y r o b i l n e m  
o b t a t h r e e n g u a n t a e l d y s i s .

C o n t a c t 3 6 0 - 4 0 0 6 6 4 8 6 1 @ e c y d h w a a g p u e s t a b o t h t i s t o t r e r  
r e q u a i c r e idl a m a l . a v a i t t o d v t y d a u y o u o n s u l t a n t s .

S i n c e r e l y ,

**p**   
Dear nams | n s p e c t o r  
H a z a r d a s s a s e D o x R e s u p t r i o g n r a m  
S o u t h R w e e g s i t o n f l i ; d d

c c : B r e l m o t r g e C h r s e e n E a v d e o O n a n e s n u t b a t h e m d r i 1 @ c o m c a s t . n e t )  
D o M g i s / e , n c W a v P e e n s o R i n c t E c o ( D a m u g l a s . W i s e @ c i . v a n c

E n c l o s e d o m p l R e p o n t i @ e m p C l o y , p l C a m d e f i c a t e

Fac Name: <b>KPMC NAMARA</b>	Facility Type:	PAGE 1 of
EPICR#: <b>WAH0002556</b>	Inspection Date: <b>10 / 08 / 08</b>	
Sic Contact: <b>TerrainTech Corp (905) 770-3000</b>	Inspector(s): <b>Douglas G. Wright - Protection Nolaant SWRQ - HWTR</b>	
Address: City: Zip: <b>503 MSA Erina Avenue, Burnaby, Vancouver WA 8661</b>	X Full Inspection ERT# 608877	

#### Phototask (emiragee) :

S a m p l e n s o :

Note is in compliance as expected.)

*Th w a s run a n n o u n c e d t w a i s o m i. t t i o n t v e e d s E t R T g s t o e s w f l a c h l e g h b u  
M c N a m a w r a a s 't s e w a n t e at ir r a c e o n c e n t o r f a e tr i c a T h s e n s p e c y c t a i s o m i t t i o a t e d  
d e t e r c m o i m p e l w i t h Dea n q e W a o s u R s e q u l a t i o n s .*

Douglas Neo, I want you to meet Mr. John D. Lee who is a lawyer in the law office of Mr. Lee and Associates. He is a very good lawyer and has a lot of experience in the field. He is also a member of the Bar Association of New York City. He is a very nice man and I am sure you will like him.

- Th e w æ s t r o m g m s r a ei In ls ti h u e a r e h u u e s b e s e r e d e s r i e s i o d t h 1 h f e 1 a a d c a r d buonadœdr t - d o wRaessai pnp e a b e d d r a ionfti fmpg l a s t e a s t e i v n g r u a d l l e s w e r s e v e r æ l t d i a mla \$ e i k t f e d d e s s p e i w l e l c s e a u n p e i d r e g b h a s M s D u t c h m a n s a y d a n t h a t e g k d i t t y a b s h e d l p t y h m e a t e t r h i e a h l o v e i t r e a d l o u h d i n d o t o b s e k r i v t e t b y e c u n g e d t h t e i n B e a s e d h c e h e m o c r a p d s o i f t h r e e s t i p r h e n o l f o r m a l d e i h i t y s b e s l t i , k t e h l a y c e h e m o d a s r i g i n a t i s p g e d s i o c h m a h e t t l o e r .
  - Th e w æ s s e v e l g t a o l t d e s h s n t g o i r e s t i h u e a r e h M u D s u t c h s m a a f n h t e o t e s c o n t a v i a n s t a t f e r r o r a s h t i n t g e s a f h l a g r o s t e a t w a s o t f e f i f t o r e v e n o a n t h s b u t t h w y r e s e t a r t t i e m i g t o w H e s a à d h t e o t w e s t a b e a l s e d d a n g w a s a s t u s d e r e m a r k w e i d s h t a a t M e e c o u l d n s p a t b d f t h t e o t b e s c a u f s h e a t h w y r e s e t o r f d r e x a m p ö e w a i , d e n t a i s p a c e ) .
  - W e o b s e d a a d e w r a o s u l t s æ b c e n t e v e r a R i \$ t a b v e s n s o o t b s e r A v t e d a t \$ t r t e o t e s h a b l e e s n t o p æ s l t o - d b o y b s e s t a d t o - t d G a - t G " - s C 8 9 a - n 0 d 8 6 " - 1 3 A - g 0 a 8 f i " h l e a b e l a n s t a t a t f e o s r l t b t c e s u l b e v i c e t w a e n d l t s e a s o t t a b l l e e s e v o t h a w e a r s t e t o h a s t e e o m s i t t e n g h e a f t a y s .
  - A l o l f h t e o t w e s c e l o s e a d p p e a b e d g o o c d n d i N t o s p i n l e l r o s s b e r i t h a d a o f a t h t e o t M s D u t c h m a n l m a t e h t i e o f g a r e w e l h y p e c T t h i b o o n g a s u r r i e o t t e d t M r D u t c h m a d r h e c k æ f d f i t h r a e d J h v a t s t d e i s s p o w e d h a r l l b h a c l u m u l a t i n a e n "d t h e i r a e d e q a a t s p a c T e h " e . o f g o l r o / 3 i / n 0 d 8 i t l a t t e v r e e n e i n e t 3 y 3 - 0 t - w g a l t l o o t o v s a s w t a t e r .
  - Th e a s t e w a t e r - t a a c n o k e s t e n l p a f T h i b o a n i i h y p e l c o v g a s u n r r T e h m e t w a e s i o p u i d t h f e l a e a h t e a n k a s p , p a d r r e a n i b n l o t i g n e a u r t i s l i i n t k l y . I s o d u r i a d i t n o h u e a r l d a r t h o e v e r l d e o a t n s d a l y a v n e i g r a u t e s h h u e i l d i n g .
  - Th e r e a c m t a l i i r q u i d i n d s e M a D t u t r c h s m a d i n p u m p b l e i q i u n i t t o w e a s t e w a t e r a s t e e d s e e v , e r a a l d a t y l l m s e u s m a p t h t e e r m e i m o l f l h t e r e l m a t t h e e f n i w l i d o n c r e t Th e w e r e t e v t o o t o e f s i n s e ( w t a o d x a i m o g e w r a o s u n s e a h t e r e w c l t h o p s r e o x f d h i e y o v e r l d e a d t s e w r e e s e v e r t a t l o r t f a u s f l i n s e l w o a c t a t e r e d S b e y c o n c o a n t y a i n m p r t h e t s o e t w e s s u e s t i o n a b l e .

KRMcNamara's pNecctei so h  
Oct 08b2e0r0 8

Page 3

- Ia s kMrd.u t c hambio:ui\$nh f p m a \$ t e w la h a d c r o n t at ir m a n t o u m r i s r c u r y , x y l a n t e n z d h e a t bwea swtæls a u a w elby,utth e e t u t r h e a t c u m u t l a a n t k i s o n a s k f e d c o p y f hmea n i f r e h s i p a n e M rD.u t c h m a d i n d i d . n h ' a i t v h e h a d d i s c a i s t d a t d . w h a e s w t æ s o d t i s p o l a s e k i e M d r . D u l k o b t m h e o u o & g l e n e b e n z h e s e a h i d i d k n n ' o f w t o u b l e d a i h e a l s a h e d i d n ' w h a k y o w a s .
- M rD.u t c h m a l B l r e e d n o t r g e o n f s r o e n e K E s n i v d i e r o n f r e e n r t d a h l e c u a s b o t u b m e r c u r y c o n t a v i a n s i M e g l . o r g e i n n s d o i n t l a h e e t i g h n i a p m a s e n B a c P d w V e a r ( P P V ) , w h o e j e t c h s e d p m e n t i c b o e n c t a t u i r s m e e d e r c T h y a s w t æ s e t u t r h e a t N a m a r a a n d f l f o a b e d h K R M c N a m a r a c a c ' u s m u t l a a n t G s s e p t e 3 n 0 2 , @ 0 t 8 h y e a s w t æ s m a n i f e s t t e R S e f v P o e r t ( M a n r d i C @ 5 2 # 4 J K T ) h w a s w t æ s r o f a i s l e d c o n t a i n m e g c u t r y a c e M R P b . y t i h c e i a t B b r d t l e a n e l b w e a s t e .
- M rJ. o r g e s n a K o M c N a m a r a d b o e t l i t e m e e r c a u r i y g i i n d a p e r d c h e u s t u , s p e c t e d t h a h m e e r c w u a r a y l r e i a b d y e a n v k h e e r i n r r a t k E M d c N a m a r a h e r a n s ( p N R G e r E n v i r o S n e e r v f n a t t a k ) e p r t e h v k o o u B P V K . R M c N a m a r a t a e m p o b e t d a s i a n m p l e o f h w e a s f t r e B m V b , u w t a b a t e t h d a h s e a m p h a b e e l m F b t r h r i e s a s o M c N K R a r a a s s u m e d p o n f s o r b e a t h i t e g n k h e m Q w g a W a a s h .
- M rD.u t c h p m r a o n v m e w e i d t h m e a n i f f e a s b t b s n g e w r a o s u t s e i p m e i n n t a s e 2 @ 0 B h e s e i n c l u d e d :
  - o M a n i f 0 e 0 s 4 t 0 # 5 0 3 w 8 i 5 t J t J o K t e f s o n - R C R A P d # 3 3 7 4 2 2 e 0 B f ) - = s i t A u g 4 @ 0 0 B h e a n i d f e d t n d i t d a t t e a s w t æ s w a \_ s t o e s w t a a t t e e r - ' o n l y d a n g e w r a o s u t s e .
  - o M a n i f 0 e 0 s 5 t 2 # 1 4 1 w 7 i 2 t J h t k 4 6 0 0 g o w a s h e s w e t t M R S e r v a n c e s S e p t e 3 n 0 2 , @ 0 8 .
- M rD.u t c h d m i a d o k t n o w h e t h n e e s h i p m a \$ t e w a u t e a p e a l d e s a K e r r y M c N a m a r a k a t b s a s r e r a n g e m e n t s .
- W e w a l b e d s a i d b s e s e e m p t o y t V e s a . l e b s e f v t e o d t w e i s t a s ( t h e t e s d i n d o r t n e t h d e e f i a T e m p a t s y e " f i i W A C 1 7 3 - 3 T 0 h 3 e ) o n t v e e n m e s t p e c i f i c a l k n o w n t h p e r o d l u a d o t e e l n s a o n f e o d f h t e o t l e r s e v i t h M e a d t e S r a i f a d a g a n e e t s a n d e v i t w e d a f b y m d l B u c r a n ' H B a n d T e h f e l u s d a s i g a n s a t e e s t r e m e l y h a z a r w d a o s u ( t s e a r E R W a s g C e d W T 1 0 e a n t h h e B F u l d l e e s r i g a n s a t s a t t e o - x o i n l y d a n g e w r a o s u ( t s e a r E R W a s g C e d W e T 0 2 ) : .

W e c o n c l o u d r e s p e a m t d t i h o a n M k r d . d t c h f o n a m i s o f s f i a t t e 2 : p 1 . 5 m .

#### POST INSPECTION

O n O c t o 1 b 0 2 , @ 0 1 8 e c e a i n e e n h a r i B m e J n o t r g e o n f s r o e n e K E s n i v d i e r o n h h e e n d a t a t e c t h a a b n a l o y f s r i e s e f f d f u M R T S e r v h i a c h s o m o n - d e t c e o n t c a e b n l b e r f a e t r i c u r s y .

O n O c t o 1 b 3 2 , @ 0 1 8 o n t B o r t e J n o t r g e o n f s r o e n e K E s n i v d i e r o n h h e e n t a c l u t s h s e e d l o v y i

- M a r : # i 0 i 0 f 4 e 0 s 5 t 0 3 w 8 i 5 t J t J o K t e f s \_ n o n + R C R A P # 3 3 7 4 2 2 e 0 B f ) e s i t e A u g 4 @ 0 0 M B r J . o r g e s n a s f o h w a s w t æ s r a i o r p e t f o t h v s a s o r t i n s e w h a s e r b e p m o f a i d d e s i g n a t s e d d a n g e r o u s .
- A n o t s h e i r p m e i n t s e w w i b a l d e i r c k p k PM c N a m a r a t o 1 b 5 2 , @ 0 B h s b i p m e n w i l l a r e m b l v , @ g o a l b @ l a s i g e w r a o s u t s e d h s e i A e d d i t s i h o i m a n w e i b l e l s s c h e d ( u " l a e b o n p e e w r e e f k o a r b o a u t o n t h " ) .

Oct 08 2008

- A t hti is M c N am i a r a k i a m g a n g e o w e s t t s e d a s p e M s D u t c h m a s n i l n d f b a e v e r d i h o a t k t e h e a s r e r a n g e m e n t s s w e a l d M o r M c N a m a r a h a h d \$ e a s p e c a c p e i t a K t P i w o a n s t e w a b t e r a M R S e r v p i c b r e a t h w e i b l e l t e s t e r s u h e n t e e t h p e r o f h i a e a c t w e i t h s t r e g a c r y c a n d a m i h a c o n c e n t r a t i o n s .
- M r J o r g e d n i s d o k t n o w h r y o n - R C r R P A t t o t e s w o u n l i d t e x p l a t h M e D u t c h m a l s ö n d o k t n o w h e t n h a y r o w d h w g r i e h y e a r d .

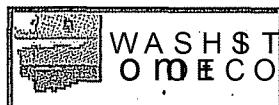
I r e q u e a s i M S e D S o t r H e B F u l t l o e t r e y a v t a s u o n d - s H i B t e F . i f o t w a t r h e s D S a f e d a y c o m p l a b t o e d d e s i g n a l H e B F u l t l o e t r e h p s o d i u s s t a t e o o d n a l a y g e w a o s u t s e c a r r E y P i A n a g s c t a e M e T 0 2 .

I a l s o m p l a b t o e d d e s i g n a l B e u o s n a o f T h i p s o d i u s s t a t e o o d n a l a y g e w a o s u t s e , c a r r E y P i A n a g s c t a e M e T 0 2 .

TABLE A - WASTE SUMMARY

Waste/Product Observed	Amount	Location	Management
1. Chromate (non-hazardous)	Five 30 - g Taotleson	No rethol the warehouse	Contain sealed good second ILtaibea ldon-hazard d ou waste.
2. Waste water (nontoxic)	Net 30 Tw gTaotleson (0 220,100s0)	Inside Warehouse	Contain sealed good second ILtaibea lss pabemited inspection.
3. Unknown solid Waste	One 30 - gtaotleson, F30 P01	Out siido_tee Storageagred	Closendg o occo n d iCtio no the n t s unk n oNvai a b e M r D u t c h m a n i d t hweas lt eo K e d ea nsida le com sif os mteime .
4. Unknown (Busan)	One 30 - gtaotleson, 5%u 1	Out siidoet e IS t o rYagred	Closendg o occo n d iDte inogn. I l i qluatle "IBeuds1a0n0 9WB", "Tri Rin a e "Cor rTasxive".
5. Unknown (H Buller)	Tw 30 - gtaotleson, 25% fuselc com d t a i n e 0%	Out siidoet e Storageagred	Closendg o occo n d iGtrieenn. - i sh l i qluatle "IBeBdu l l e r WB 3706 R B M r D. t. l t cochumlaft i M S D \$ or mate S e p a l o s t - imst. esct ion
6. Unknown (Caster oil)	One 30 - gtaotleson - i ofiquid.	Out siidoet e Storageagred	c 1 oashendg o occo n d iBri owhn. qu d M r D u t c h m a n i d teod e n t a i n e d Caster oil





Washington State Office of Ecology

Internet Address: //www.ecy.wa.gov

South Region 800-1	District Regional Office	Deputy Regional Office	Office of Research
P O Box 47775 Olympia WA 98504-7630 Phone (360) 426-0597 FAX (360) 426-0597	319-06 EA.V.S.E1 JEB 11 WA 98085-4520 Phone (425) 265-3400 FAX (425) 265-3409	460 N Monroe Street Seattle, WA 98101 Phone (206) 584-3400 FAX (206) 584-3529	150 Westlake Avenue North Seattle, WA 98101 Phone (206) 584-3400 FAX (206) 584-3529

## COMPLIANCE CERTIFICATE

The documents submitted to the Washington State Department of Ecology on January 20, 2000, in support of the application for a permit to construct a new facility at the proposed location (approximately 1000 feet west of the existing facility) are complete. Your request is hereby denied. Please contact the State of Washington Department of Ecology at (360) 426-0597 if you have any questions or concerns.

### Compliance Certification

1. Corrected.
2. Complete.
3. Complete.
4. Correct.

Signature:	Print Name:
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Position / Title:	Date:
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### Check Evidence Submitted

Violation Number			
-340(3)	&	D	D
630(5)(e)			
-170(3)	D	D	D
170(2)	D	D	D
-630(7)	D	D	D
-320(1)	D	D	D
-145(3)	D	D	D
950(2)	D	D	D



# Washington State Department of Ecology Hazardous Waste & Toxic Response Program

## CHECKLIST SUMMARY OF VIOLATIONS FOR GENERATORS OF HAZARDOUS WASTE (Page 1 of 2)

EPA RCRA #: <b>WAH 000 025 256</b>	Facility Site ID#:	Facility Name: <b>KP McNAMARA</b>	Inspection Date: <b>10/08/08</b>
<b>Dangerous Waste</b>  <b>Inspectors:</b> <b>Dewitt Naorinhardt SWARO - HWTR</b> <b>Douglas Venable Waste Resource Program</b>			
<b>Instructions:</b> 1. Violations found at facility shall be completed. 2. Document the fact that no corrective action has been taken to eliminate the violation. A copy of the corrective action plan and certificate of completion shall be submitted to the state by the due date indicated on the inspection report.			
Facility status is evaluated for each item on this Checklist as follows: V=Violation NA=Not Applicable PV=Previous Violation (from previous inspection)			
WAC Code 173-303+	Conditionally Exempt SQG Requirements		Facility Status
	V	NA	PV
- 070 (8)	Quarantine - Isolate between units to prevent cross-contamination of wastes or in facility due to fire or emergency.		D D D
- 070 (7)	Identify and control waste streams to prevent terminations.		D D D
- 070 (8)	SQGs to prevent release of wastes into the environment.		D D D
- 070 (8)	SQGs, except for gaseous wastes, are designed to contain wastes in a manner that prevents release into the environment.		D D D
- 060 (5)	If held at EPA, hazardous wastes are properly stored in accordance with regulations.		D D D
- 060 (1)	Site areas: visible from public areas and adjacent property.		D D D
- 060 (2)	Records of all incoming and outgoing wastes are maintained.		D D D
- 060 (5)	Annually review waste streams to determine if they are being managed in accordance with regulations.		D D D
- 210 (2)	Copies of WACs and permits are posted prominently.		D D D
- 220 (1)	Designated responsible person is available to respond to emergencies.		D D D
- 210 (3)	Waste designator is clearly visible.		D D D
- 180 (1)	Owner maintains proper storage conditions.		D D D
- 210 (1)	Significant risks to health and safety of employees are identified.		D D D
- 220 (2)	Accidents involving wastes are reported to the appropriate authority.		D D D
- 140 (2)	Procedures for handling wastes are followed.		D D D
- 010 (7)	Identify and control waste streams to prevent terminations.		D D D
- 170 (3)	Emergency response plan is developed and maintained.		D D D
- 300 (5)	Risk assessment is performed.		D D D
- 170 (1)	Waste stream is designated.		D D D
- 070 (4)	Waste stream is identified.		D D D
- 070 (6)	A label is present on containers identifying the waste stream.		D D D
- 141 (2)	State WACs are followed.		D D D
- 630 (5)	Contingency plans are developed for emergencies.		D D D
- 200 (1)	Dust collection equipment is used during cleaning operations.		f g f g
- 630 (3)	Containment barriers are used during cleaning operations.		D D D
- 630 (5)	Containment barriers are used during cleaning operations.		D D D
- 630 (7)	Containment barriers are used during cleaning operations.		f g f g
- 082 (3)	Solid waste is managed in accordance with WACs.		D D D
- 630 (6)	Dust collection equipment is used during cleaning operations.		D D D
- 200 (2)	Satellite collection areas are used during cleaning operations.		D D D
- 630 (8)	Containment barriers are used during cleaning operations.		D D D
- 200 (1)	Containment barriers are used during cleaning operations.		f g f g
- 630 (4)	Containment barriers are used during cleaning operations.		D D D
- 630 (9)	Incompliance is present.		D D D
- 630 (5)	Minimization of waste generation is present.		f g f g
- 201 (2)	Waste minimization is present.		D D D
- 016 (5)	Spills are cleaned up immediately.		D D D
- 505 (2)	Proper storage is used.		D D D
- 802	Compliance with requirements.		D D D

EPICRA#: WAH0002556		Facility <b>KPMcNAMARA</b>	Inspection Date: <b>110/08/08</b>	(Page 8)
		Facility Initiative & Audit Deadlines from the Checklist below:		
		V= Violation / N= Non-compliance / P= Previous Violation		
WAC Code 173 - .303	MOGd: III. qG Requirements (cont.)	Facility Status V NA PV		
O 111 0 10 a 0 u i c e 111 P e 10 l a c o U 0 c E i 0 - a u j i 10 c o {	<p>-340(2) Communication of spill/violations to employees [reg by - 200(1)(D)] D D</p> <p>-340(1) Emergency preparedness / training and communication of spill/violations [reg by - 200(1)(D)] D D</p> <p>-202(c) Post-incident response plan including communication of spill/violations [reg by - 200(1)(D)] D D</p> <p>-202(c) Design and implementation of emergency procedures for handling spills/makeshift fire extinguishers/hazardous materials [reg by - 200(1)(D)] D D</p> <p>-2320(1) General liability coverage for third parties [reg by - 200(1)(e)] IZD IZJ</p> <p>"320(2) General liability insurance coverage for third parties [reg by - 200(1)(e)] D D</p> <p>-320(2) General liability insurance coverage for third parties [reg by - 200(1)(e)] D D</p> <p>-320(2) (T) Required coverage for third parties [reg by - 200(1)(e)] D D</p> <p>-320(2) (T) Required coverage for third parties [reg by - 200(1)(e)] D D</p> <p>-340(4) Arrangement to handle off-site emergency situations [reg by - 200(1)(e)] D D D</p> <p>-515 Required equipment for emergency preparedness D D D</p> <p>-515(4) Use of standard practices for specific situations D D D</p> <p>-515(5) Use of standard practices for handling dangerous wastes D D D</p> <p>-515(6) Contamination of soil by asbestos removal [reg by - 200(1)(D)] D D D</p> <p>-515(6) Oil spill cleanup [reg by - 200(1)(D)] D D D</p> <p>515(6) Contingency plan for emergency situations D D D</p> <p>-515(6) Use of standard practices for handling asbestos removal D D D</p> <p>-52(22) Anti-froonetzadiabed [reg by - 200(1)(e)] D D D</p> <p>-120 Recycle/reuse facility D D D</p> <p>525(1) Bilingual signage in English and Spanish in facility D D D</p> <p>-505(2) Recycling bins in all areas where wastes are generated D D D</p> <p>-505(2) Proper labeling of wastes in accordance with regulations D D D</p> <p>525(1) Bilingual signs at major points of entry and exit D D D</p> <p>-145(2) Aspiration ventilation system directly D D D</p> <p>-145(3) Aspiration system for aspiration of dusts in environment IZJ OIZJ</p> <p>ISQHUV: &lt;11KUWS &amp;&lt;2.2K Lamps - 573 (UW) management of waste in environment. O D D</p> <p>LQHUV: &gt;11KUWS &gt;2.2K Lamps - 573 (UW) aspiration of lead dust in environment D D D</p> <p>- 573 (UW) management of waste in environment. D D D</p> <p>- 573 (UW) aspiration of lead dust in environment D D D</p> <p>- 573 (UW) aspiration of lead dust in environment D D D</p> <p>- 640(6) Daily inspection of asbestos removal site D D D</p> <p>- 640(5) Tank cleaning schedule for removal of asbestos [reg by - 200(1)(b)] D D D</p> <p>- 640(4) Secondarily if necessary to remove asbestos [reg by - 200(1)(b)] D D D</p>			

I-5 facility Q&P DW (general, electrical, insulation, asbestos) YES  If 8 failing L&G checklist

Notes:

## Washington Department of Hazardous Waste &amp; Toxics Program

## CHECKLIST SUMMARY OF VIOLATIONS FOR LQG GENERATORS OF HAZARDOUS WASTE (Page 3 of 3)

EPA RCRA #: WAH 000 025 256	Facility Site ID#:	Facility Name: KP McNAMARA	Inspection Date: 10/08/08
LQG Generator	Inspectors: DeWitt iSAWRSO, - HWTR Dowis, Sean C. Waer ResouPractecion		
Dangerous	Instructions: 1. Violation of state law or regulation by facility employees. 3. Document that facility has been informed about corrective actions, if applicable, in writing.		
	Waste Facility status is evaluated for each item on this Checklist as follows: V=Violation NA=Not Applicable PV=Previous Violation (from a previous inspection)		
WAC Code	LQG Requirements (Generates more than 1,000kg/2,200 lbs/270 gallons per month of HW)	Facility Status	
C-2	E-170(a)(8) by r200(1)	V NA PV	
J-1	-330	The facility is required to have a written program for managing hazardous waste generated by the facility.	
G-1	-330(1)	A program for managing hazardous waste generated by the facility is in place.	
C-1	-330(2)	ADW training is provided to all employees [ abbey-e2.0.0 (1) (e) ] Washe1tahg hyoreue vi a waerdt hii pesc t Yes? No 181	
C-0	-339(2)	Written procedures are maintained for managing hazardous waste generated by the facility.	
C-0	-330(3)	Persons managing hazardous waste are adequately trained [ abbey-e2.0.0 (1) (e) ]	
C-2	-350(2)	A contingency plan is in place for managing hazardous waste generated by the facility.	
C-0	-350(3)	Contingency plans are maintained for managing hazardous waste generated by the facility.	

## Notes:

The facility is not in compliance with several regulations; more violations may be found during inspection.





THE STATE  
OF WASHINGTON

Washington Department of Ecology  
Division of Air Quality

Internet Address: <http://www.ecy.wa.gov>

1800 University Street PO Box 47775 Olympia 98504-7775 Phone (360) 763-0505 FAX (360) 763-0505	DeNorthwest 3190-1A6V0SE Bell WA 98008-5452 Phone (42654) 9700 FAX (42654) 97098	Deastern 4601 Monroose. 4520 Kanawha 92405 Phone (e5:0392) 9-3400 FAX (503) 293-5299	DeCentral 100 West Yakima Avenue Yakima 98902-3452 Phone (509) 524-9000 FAX (509) 528-0900
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## NOTICE OF COMPLIANCE

1. You must stop discharging oil into the ocean in a manner that causes significant damage.
2. Are you in compliance with all relevant regulations?
3. For more information, contact the state department of environmental protection.
4. Correct identified violations as soon as possible, or face enforcement action.

Inspection Type	DCAV	DCDI	D.FUI	Other	PAGE
Compliance Evaluation Inspection	Compliance Case Assistance	Follow-up Inspection			
Facility Name: <b>KPMcNAMARA</b>				Inspection Home #: <b>DeWILLIAMS 407-6348</b>	
Inspection Date: <b>05/07/08</b>				Inspection Nature:	
Inspectors: <b>Nolaatt SWRQ-HWT R</b> <b>Douglas Veanon Waressou Project</b>				State/DEP#: <b>WAH0002556</b>	
Sightings:				Other Contacts:	
<b>Terraneum Manco Operator</b> <b>Site 60-695C &amp; 4501-377-3088</b>				<b>Kerry Namowale 216-361-8955</b> <b>Brehotregen SelekEnviromen</b> <b>503-692-8118</b>	
Sighting Description: <b>50 SEMari Avirel, 56 tB</b> <b>Vanco WA 8661</b>					
Violations: <b>(WAC73-303)</b>				Written Summary of Violations:	
				<b>WAC 73-303-200(y) (f)(b)-(3)n4(e)(1)(b) (5) (d)(n)raein naa in thir thy i-ri inadmiss peake tweewost ontaus etascumulate danger waAtned.ait mae nade quai tsepeat cur nob struc te movemeather gpeccy oammeqlu ipmèt lifecility.</b>	
-34 & (3) 630 (5)				Observations: Awareness of the potential hazards of oil spillage, including the impact on marine life and ecosystems, is to be addressed during inspection.	
				Requirements for prevention of oil spills, including the use of best available technologies and equipment to prevent oil spills, are to be addressed during inspection.	

K P - M c N a m Naortait, Ceo m p l y

P A G E

WAC173 - 303 a 17 yr (e3) e r2e0n0c(e1A)c(cau)m:u wa ts d s e m a i o n n e - d s i f e m o r t e h a r n d a y s .

O b s e r v a At the o a h s t r e o t o e f v a s t e w a s t a r t t e o d i a g e w a s i W 0 2 ) w e m e a r k w e i d s h a r t t h a l t o e w e t h e a s t e d e 0 n 1 1 e s @ D e d S y e r a l o t h e o r t m e a s h y a v e l b e e o m s i l t e n g l a n - 9 0 - d a y s .

- 1 7 0

R e q u A c t d U p n o r n e c e if p h t i e s t c o m p a i n i e v e w t v a i s y t u r r b e b d y s i - t a e d d f t h s e t a r t f o r d r a c h e W e i t h i d e y o s f e c e if p h t i e s t s u e b r a i t c o p y f h i e n v e n t f o r y l A g w y a s d r e - s b h @ b @ 0 - d n a u y s t e d i s p o s e d w i t h e i d m a y o s f e c e if p h t i e s t W l e s y o u e t t u h e n c l C s e m p l C a e n r c t e i f i c p r o v c i o d p e o n a n i f t e d s o t c s u m p e r n o t p e s p o f f a w i l a s t e .

WAC173 - 303 - 17 yr (e2) e r2e0n0c(E1F)a( id l t u r a e b c e o l n t a a i s n e r " H a z a r d a s u t s e r " D a n g e W a s u t s e n d f c a r i t u p r e o v a i l d a e b t h l a t i d e n t t i h f e a g s o r s k .

O b s e r v a At t o i t o e s s n e o m a r k a e s t a n g e w a s i d s t a e f t i h r e i e s b p o s s i b l t h a d m i e o t a e c s t u h a a l p l r y o p a b e b u t t h g e a b e d u n l o b t e r e a b e c a a s b e w a y o t w e s s e t o f e d e i h s u f f i s p @ a @ c c e t s o s m p l t h i e r e s p e c t i T a t w e h s i o d h u b l e d b s e m w i d a b b l e a D a n g e W a s t e b l u a t b r e i l s a k b e l .

- 1 7 0

R e q u A c t d U p n o r n e c e if p h t i e s t i t r e s r t a i p t r u t o t e d s a b a e l l o n t a s i d h a a s t h i e n f o r m a q u @ p r e e s a e n n d t o e n s o b t e c o m b e s c u r r e n d o , w e o d t , h e r w i s e u n r e a d d e t h b e e r p o s f e n s p e W l e s y o u e t t u h e n c l C s e m p l i a n c e C e r t i f i c b u t h e n o r p e h o t o g s r h a c p w h t i s m y d u o n t a a i m p e r r o s p e r l y l a b e l d .

WAC173 - 303 - 20 d y r 1 e ) f ( e b r f e 3 n 0 c ( E 7 a ) i : l t u p r e o v i d e a d e c o n a t a e c o n t a i n m e n t s y s t e m .

O b s e r v a O t v i e t o n s @ @ d l o d i n a \$ g e w a s i w s e b e i s n t g o r e s i d i e K P M c N a m a v r y a a ' r s e h l o t u s e r e o a t p p e t a n t a t . e w a r e l f d a s e d u s b y s t c o m u d c o n t i a 0 % n f h v i s l u a n s r e q u i r e d .

- 6 7 0

R e q u A c t d P o n o v a i c b e n t a i s n y m s e t f e d m o n t a a i c r e i m u a a e t a h s a n t c a p a d b l o e l d i n a g n t s e p a p k e W A C 1 7 3 - 3 0 3 W h 3 @ y p 7 i e t t u h e n c l o s e C o m p l i C a e n r c t e i f i c b u t h e n o r p e h o t o g s r h a c p w h t i s m y d e q u s a e t c o n d a r c o n t a i e n x m i e s t l t s p o r , o V E i c d b e l v o i g t y h f o r r a b o t u h e n p a c f i t y s e c o n d o a r t y a i s n y m s e t i n s t i h e a r e h o u s e .

WAC173 - 303 - 20 d y r 2 b ( y e e ) f e r E a c t u r o e n d g e n e f r a c i l i t y i n s p e c t i o n s .

O b s e r v a S t p i o l l s s e o n c w e t o b s e n i v e d h e a r e h o a s e a u n t d d o w t o t r e s s a h t e e a n d t i s l i i n A k y d o t o e f i s k n w a s t e r o b s e n i v e d t h o e u t s s i t d o r y a a g r e d .

- 3 7 0

R e q u A c t d P o n o r n d a n d o , c u n g e e n t e f r a a c l i n s p e d m e c t r h s e p e c r e q u i r e m e n t 2 0 ( 1 3 ) s p e m t u b d e n i s e q u e r e m t t g o h d e r a t n i d f y c o r p e o b b e n i s h a y r h u m a n e a d i t h e e n v i r o W h e y d u e t u h e n c l C s e m p l C a e n r c t e i f i c b u t h e n e s e c h e a n t l e o s g h e e t .

KPMcNamara, t @ontpibye

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	WAC173 - 303 - F1a4i5I (ur) jet i g p t o n s l e a s e s .
- 145 (3)	<p>Observation: b s a r o c d - d o w n s h ewrass t r p m e n o o d o n s t i h e e i l (dqiupigt sesoi r b l g y i f n r a d t h i s e p g T l h l e y a e r e l e a f s i e u f r o m s t i h e e r e h p a s e d v a l t y o i h a e g a a d h o e v e r b d e a t l s o R e s i n d u e l e b s e o o z d n g r a l i t e s t e t s o u t s i d e</p> <p>Request: d b m n s e d ii a n t s p i l y s a i n d o e u t s a i r d e a s n i t i a g n a y e d e a s e W h e y o u e t t u h e e m c l 6 s e p l C e n d e p r i c c a i t d e s c o a i n p y t i d o n t a k t e o n l e a s n p u i p A l l s o o v a d d e s c r i p t i o n b t w i b l e t a k t e p n r e v e n t f u t r u e r l e t a s s o i r t , d h e r a o u e t l s h e e b u i l d i n g .</p>
- 950 (2)	<p>WAC173 - 303 F9.5 O t t u r a e v a p e r n i t c e p r t e q a d t i s p o s l a n g e r o u w a s t e .</p> <p>Observation: - e t n o p t e y s ' e t o o u e t l K P M c N a m a r a ' e s h o u s e T h e s e w e s s e t o a r e b o n i g d h h t e o n a e s r i f v r o m g f e a s t e m b e s t f o u e w e r r e i " o e t m p a t s y e ' f ' i i . WAC173 - 303 a n t l K P M c N a m a r a a s e d d a n g e r o u s w a s t e s t r e e a t s m t e o n r a n g d e s p o a s c a i l l i t y .</p> <p>Request: d b m n s e d i c e t a t h e r a c o f a i c c c e e p t b i t w e i g h t a z a r r d e o u i s d u u n l e s s t o a t e r e s p a t s i e f i i WAC173 - 303 D e S 0 g t f i s h e l o w i n w a s t e a ) o d t e n k n s w w a s t 2 e t w b o t b s n k n b w q (u m i a d r a k s e d ' H B F u l l b e n d ' ) o d t e n k n b w q (u m i a d r a k s e B l u s a D r e ' s ) i g m a i t n i e o n t h e WAC173 - 303 b u i r V W h e y o m o r u s e t t u h e e m c l 6 s e p l C e n d e p r i c c a i t d e d e s i g n i a f o o m a d o b a g p o o v i n d e r a n l a d t u h b e n i o g f i h n e a s t e ( i w a e i p t r r o n e d i n w l e e i n t a g e n e r a n t w e h d y ) h w e a s w t a e s c c e p t e K P M c N a m a r a .</p>

### O t h e r q u e s t s

WAC173 - 303 p- r2o2V0E(cBc) l s o i g t y h a e u t h b o r e i q y i e n s f t o r a n s p t e i o t t a d i h d e s s p o o s f i t  
w a s W h e y o u e t t u h e e m c l 6 s e p l C e n d e a f d i d c r a t e s , l l o w q u i f c i n s o r m a t i

WAC173 - 303 - 07D e s t r u c t i o n o n g d y e r s t t h a n t d s e h w a d s t e e d r e s i g n a t e  
s t a t e o o d n a l i n g e r o l T , h l i s a s w a i d s t e e t M R F S e r v a n t e r s e a p t r e i t d o r e a t m  
t h w e a s w t i b l e l a s t o r t a g a d M R P a n t l e s t t e e r m i n t e e t t h i p e r o f i l e  
c h a r a c t e r i s t i c s .

P l e a s e v c i o p h e e b a e n a l y t i s g a b e r f a o t r e d c r o s t K P M c N a m a r a i n l a s i r h a i g p s t e n  
t h e e s t a b M R F P r e d f P i r l o e d i a d f e e r a c h i p m a n a g e s d i t t h e r d M R P b , t a r t i n  
S e p t e m b e r 2020 at 81 r d M u g v h e m 3 b 0 2 , 0 0 B t f . h a i n s a l y a d e a n b e t x i t s h t p , m o v a i d e  
d e s c r i p t i o n o n l p y r s o i v s i y l B B t e n s t K P M c N a m a r a s ' t s e m a t e t h e e x i s t i  
p r o f i l e .

WAC173 - 303 - 2001 (y1e) f(ebr) e3n0c(d) e k l l n y s p e c M i r D u s c h w a a s r o n d u c  
i n s p e c t i o n s w r a s t s e c u m u a l r a e t b a s t h d y n d o a t d e q u a r e p e t h i g e b n d i i t n i o  
t h f e a c i l l i n y d ( i t l a e w a s d e q u a t s p e a c r e d a s h a e b o t e e a m c u m u l o a n t g e e  
t h a t - d a y s ) .

P l e a s e v i n d e r a n l a d h u o t K P M c N a m a r a i a l l d r t h a e s o i v r a d e q l u n a c l y u d e  
i n f o r m a t i o n a n g p e o l t i m a y i o n p i r n a g t t h i c t t a l p e a c e e n s t a d e q u a t e  
i n s p e c t i o n s .





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P O Box 4701 Olympia, Washington 98504-4701 (703) 324-6300

September 2010

**CERTIMATED**  
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Mr. K. McNamara  
K. McNamara  
397 Hamlin Avenue  
Cle Elum 98924-114

**CERTIMATED**  
**700077 1000245 61269**

K. McNamara  
508 Main Street  
Vancouver 88661

Re: Complaint against K. McNamara, Vancouver  
WA 00010603

Mr. McNamara:

Thank you for your letter dated September 12, 2010, concerning your complaint against K. McNamara, Vancouver.

A copy of your letter is attached hereto. Your complaint was received by the Department of Ecology on September 12, 2010. The complaint concerns alleged violations of state and federal environmental laws and regulations. A copy of your letter is attached hereto. Your letter was received by the Department of Ecology on September 12, 2010.

This statement summarizes a finding of fact. The finding of fact is based on information provided by the complainant and other sources. The complainant is identified as Mr. K. McNamara, 508 Main Street, Vancouver, Washington 98661. The complainant is a licensed electrical contractor. He has been in business since 1989. He has approximately 10 years of experience in the electrical contracting industry. He has a license number of 1050089050.

The finding of fact is based on information provided by the complainant and other sources. The complainant is identified as Mr. K. McNamara, 508 Main Street, Vancouver, Washington 98661. The complainant is a licensed electrical contractor. He has been in business since 1989. He has a license number of 1050089050.

Please mail to 60400 Avenue West, Suite 100, Seattle, Washington 98103 or fax to 206-467-4611. You may also email your comments to [ecy.wa.gov](mailto:ecy.wa.gov).

Sincerely,

William J. Hawley, Director

Dear William J. Hawley,  
Department of Ecology  
Hazardous Waste Response Program





**W a s h i n g t o n D e p a r t m e n t o f E c o l o g y**  
**H a z a r d s & T o x i c R e s u l t s P r o g r a m**  
**C o m p l a i n t R e p o r t**

**S i t e K . M c N a m a r a**

**R C R A D W A H 0 0 2 5 5 6**

In s p e c i a l i s t i n g u i d a t g u i d a t n S e p t e m b e r 12, 2007

S i g n a t u r e of g h(eGse n e r a l Manager)

Kerry McNamara (President / Owner)

Phone 360 966 - 6423

S i t e c a t i o n : M a r i A v e , 5 8 t h ,  
V a n c o u v e r , B C , V 6 , 6 1

G e n e r a l S a t a t r u L S Q : G

**E c o l o g y**

L e a c b o n t a c t : D W e l l E a m \$ H a y T y R - S W R O . Ph o n e ( 6 4 0 0 ) 7 - 6 3 4 8  
O t h e r p r e s e n t : N a t L a n t S y h a a k H o u n H W T R - S V V R O

D o w n g i s - E i d y a n c o l l a v a t e r s o f P r o t e c t ( c 3 t 6 0 0 ) 6 - 8 0 0 8

R e p o r t e d b y W i l l i a m s | k W . \ J . □ U a o b C o □  
( S i g n ) ( Date )

**B a c k g r o u n d**

K R M c N a m a r a t r a n s f o r m s - c o n s t r u c t i o n c o m p a n y a n d o p e r a t e s r a l l  
f a c i l i t i e s s u n t h a n c o f u a c e i n s t a n t a y e d f e s t a n f i n e r a n g h t  
c o n p r o v i d e d M r c y N a m a r a n e r / p r o v i d e d v e l l a n d i d o .

T h e a n c o f u a c e h a b s e t e y m p e r a t i o n n o t h i n g c o n c e r n t s e i w d a e r e h b o u i s b e d i n g  
w i t h a roget d t o o t e o n y a g r a d e v e r a s t a e g e n e r o a n t - e s i n t e u d i n g :

- W a s t e s i (d h u e e d i s a) ionuet fl n - c o t n o it Be o s t. la n g e a r m o d u s n - d a n g e r o u  
r e s i m d u y e g e n e r a t e d ;
- W a s t e t d e r a ionuet fl o tw e s t n h a y c e l e a t h e i d a s i t e i t h e e t r u t r o n s e i n  
t h e a wha t seyrs toedmr, a it rae d d o o e a n r c s h u m p ;
- W a s t e a a m d a u s b i a g t e i r o n r a f t e w d m e e a s y h e a v h e i n t s r a ionuet fl h e  
o n - s e t e i r w c a u s h a t s e y n s g t e m ;
- " D i r t y " a b s o l u t e s e t t o l ; e a o s p u l p s i h d e b u i l d i n g ;
- S a l t - w a a s t g e m e r w a t e r s a v a l l a r e a s t h p e a r a t r e o a k a n d l e a n e d .

K R M c N a m a r a s e p o a r t l e Q G E c o l p o r g e y v i o u s s i t y e a d c i l l a y 0 0 5 d i s c u s s  
s t a r t o t p - e u r p a ( t s i e o n s c o r r e s a p e o n d 8 2 , 0 0 5 ) .

T h e c o m p l a i n t r e a s n i s r e s t o i m p l e a s e a t t w o o c a s e d l , o w s u p s .

**A u g u s t 2 0 0 7 I n s p e c t i o n**

C o n d u c t e d b y W i l l i a m s

T h e s a i t e i t a i s a r t o e u d t u i n a e n n o a c o m p e h e n s i v e a c t i o n i s a e n h a r r o n e d  
s i a t e : 3 V 0 e i n t r o o d u r c s e e d b u e f s g h a e n s d T e D r u t a n h a H u g h ( e t s h e  
G e n e M a n a g e r p ) a t h a d d a t a k o e v n e d K r e A h d h p e r e v G e n e M a n a g e r .

KRM c Namara

Inspekcattie 18/0176 / 097/ 11 / 07

RCRA MDA#H:0 0 0 2 5 2 5 0

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h a b l e e w r k a i K N R d c N a m a r a s a y e a H r e o f f a s s c u o t h r o t u f e a c w h e t y ,  
w e m a d t e f e o l l o w i n g a t i o n s :

- 11 A l a r p g e r b f b w e a r e h i o u s e d i d a b t d o r ( a g g e g g A u ) T h e w r e e s e v e r a l  
t o t s e t s a c t k h e r f l e i e j h s t i h b e e i l M i H u g g h s e a s i d e t s o e c o n t a i n o n d h a z a r d  
p i g m e m t o s o n c d y e f t s t e p t w e s d e s t t i b e d a i c u e t d - d o s v e n o f a n d s i t e .  
E c o l p o r g e y v i r o e u s i l e y M e S D S o r m o e f h e p s i e g m a m d e n f i t h a t t e s i d u e  
w a s o n - h a z a r d S c e l u r i s y h i a c r e d l i e s s p o s a l .
- a. T h e w r e e s e e o w u t - d o w n s c e e n d f e h w e a r e h ( o s u e g A u ) T h e w r e e s e v e r a l  
s m a a m l a l . ( u l n t s a n r e d' - ) b r e o s w i T d h u e r a e s t r p o e g t i c o i d d e n h l a i r s k e l e a .  
a s w h e p d r o d b e s s c b o n s c d y e f t s t e p t w e s d e s t t i b e d a i c u e t d - d o s v e n o f a n d s i t e .  
M r H u g h s e a s i n d i g h t f b ' e P e p t s e f f d i e w r e a s t o n t e a t b y a t D O T p l a c o r d  
i n d i c a l 0 B M B r H u g h s e a s i l e p r e s t i w d a s e n a g e d a s i a t h e g e w r a o s u l e .  
M r H u g h l e a s f a x m e d l S D S P e p s e e t b . P o l s n t s p e N o o t p i e o s n
- T h e w r e a s t i l t a n t d a l b p e l c o o r t e h g h e r t h o v e r s t f h w e a r e h ( o s u e g A u )  
F i g A u ) T h e w r e e s e v e r a l ! o ' n s p f e l l a l o s o u t h e l q u i p a n e h o t t h w e s e  
c o a i t n e d s i M r H u g h e e x s p l a t h a e t t c o n t a n o n n i - n h g a z r a r s d i a c u l e a a d e d  
o n t b e i l t a n t a r a l l d p t w e r d a i n a t r o o t h o e t K R M c N a m a r a a g e t s o l t o e f s -  
s i t t h e r d P u h g i S l e i r p v i c e s .
- 11 T h e w r e e r f o 5 5 - g a l t u b o c a a t l e t h g e . o c r e t h v a d f h w e a r e h ( o s u e g u r e  
A ) T h e a w a l p l a c a r s ' d w e a d s t e r a g e d M r H u g h e e x s p l a t h a e t t r u m  
c o n t a l P r e p l d b e n t h e r u c h o n t a d P r e p l d b e n t h e r u m s n t a i n e p d a i t h i t e . - b a s  
s a a d b l d r u m s d e n g e w r a o s u l s e r u m s n e l t a b a k l e a d n g e w r a o s u l s e d  
d i n o h t a v a n e c c u m u s l t a a t r i t o r h e s y e e l o a s e d e i s e t t b i O a g e p p a l l e t .
- T h e i r a l a r g e i s t l e c a t h c a t h e r o l r e t t e a s e h w e a r e h ( o s u e g u r e  
A ) M r H u g h s e a s i d o n t a v i a r e d t a e n s d o a W e l a d e t e r i n h i t h e t h a k s t  
l e a t s v b c o m p a r o t m f e q n r d t s a s h y h d r , d ' l x m a d u ( s p t H 4 c l ) " ; a l s n e d c o m d . Z E P  
" s o a p p 1 1 0 T h e a w a l p i p t e a d o n v a g o r h a d l o , c a t e a d T h y e l a o o u t h e :  
t a w b a s t a w h e i d e w - i g d r h e i y e d e s p d u e .
- 11 T h e o n v w a g e r h a c k n e r t h a s o t u t g e h s e i a d s e t h w e a r e h ( o s u e g A u ) e  
T h e a c k o n f i v g i u a r h e d g n v e l y s o i t a b s o t v v o e t w a a l s t h a n t h s e r a e n ' s  
e l e v v a a t l e l d t w a y a s o t n h g e a s t d e h w e a s t h a n k s . P i p n i b a g s , K e v t a t l e v r e s  
s i n t a h w e a l k . T h a c y o n c f r e d t h a i r s w a s t a w h e i d e w - i g d r h e i s y p d i l l  
r e s i T d h u e e t t a a l n c k o s n t a d i a n t e d q M r H u g h s e a s i d t a e r k o a d e t b e  
c o n v e y a r r i e n a s n e d d o a p v e n t e a r t h s p o v a d d i r w i s v e d t o e v r e h e  
s e c d r a d W k a . s w h a t i e s r h e s t u t r o n s e d a l l o t w e r d a t i a f i l o o e w b h r c u n s  
n o r t h a r s o b i . u s t d t h e a f r l g o e o s r a t s h s e a p e t n h o f h w e a r e h W e a s s k s e d v e r a l  
q u e s t a b o o m u s t i t c o h t a e r e l e a a n r e v d h , i w c a h s t a e d e r c i t t b i h n e r d M r H u g h e s  
d i n o d t l e a r i s t y i w h g i w c a h s h v e s b l e d e u s a e n d h i w c e h d e l m p t e o d h f e l o o r  
s u m p .
- 11 T h e a r r e t w l o a r p g e l g n l k o s c a t h e s o u t h w e a r e h ( o s u e g A u ) e  
T h e t a e n s k i i s t h s a i c d o n t a a i r n e a d t l b i y p t e h d r o e f c w a e T h e w r e a s h o s e  
s i t t i n s t i g h t b e e r n a e r d M r H u g h e s t h e a n h k a s d e c e b n e t e l m y p t a e t t h e e  
w a s w t a e l s a u o f d o n - d a n w g a e s r t o b u e s i r a e f l e a a m p o c a n t e e d e t a n k s .  
w a s o v e w r i e a d h m e t a l l m i s a d o , e c h o u l l e d b n s ' e t r h o e e n d o f h i s e u m p .

K FMcNamara

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- Wewa I k a d otuhgebu t st i o raageeWes t i nt an ta t d reew e d v 5 0 0  
emptt y ti shai rseSae. v eo rfa l eo tw esrl ea b ea b eedi "ntgrri ipnl seera s", Bub r e a k  
4 2 5 3 h e r en q w a s t m a i b e n t lg etsoet & es v. eo rta hteo rtw esm a r kaesd  
con t a". t i rni imegt h a y r ab sld z e nV 200b1s"e. o n e dnt es a hoev e r ld e ad s  
t h a t a bwoal s/f3u M tH u g hseasi odd n t a idn e d s i v e ola s it ieift a d r r a t e d  
t hseiw t iet hna ut clhi qiu miach l es a y e Hes a iwd a is oda n g e M oW i sst e a l k e d  
a b . tohureti os \$k p if lr l d s a tt d s a ttci ol nl tl a i qnu i d s .
- Wer e t u tr d h e o f fairceen ,br e v i e hmeodsr te c meant i f a e n d e s of randosn - h a z  
w a s d t i e s p M s a a n li #0 0 1 6 9 1 2 5 9 d u J K e 1 2 y 0 0 7 s t h o w f e o d u a s s t e e a m s  
w e m e a n a g e d f B u t e i E n g v t i o n o n T h a n i d f i e d s h a o e r a n s p o r t e  
n a m(e s i g n w a a t s u r o e v i T d h e e d o )p y a ls a it d e a l d a p p e a t h e a t o o t e s s o d i u m  
h y d r o w x e i i d g e a t i on g 5 0 - p w a n d s a g e d H s e i a t i e n d a t w f o u t l o l t e s a t  
w e i g n h o e r d e h a h a t .

Wec on c l t u hde e d p e tt o i l d h u M rht eh s w t o u f l o d r w d n a d n s p e r e t p i o d h t e  
n e a u t d a r s e k h e idmo amelv i a m g u e s t W e o t r h s a n M k r h d i g h f e d s r i t s i a a b e f t  
t hse i O e s f i a t t e 1 : 5 0 a .

### Aug 2007

On Aug 2007 e c e a i f v a e x d M m \_ H u g h t e r s c l M S D S l D P r e p s a e n t R e p s e t  
T h i s f o r m a s t e v o i n b y E d c o T c o h g e y w i h s o t o , n f i t r h a e t d r u e c s t w o u d e l  
d e s i g n M A T 0 2 a n g e w a o s b t s e c a o p s h e e n f o l r m a l a i r e n d h a y p d h e t h a l e n e  
c o n c e n t r a t i o n s .

### Aug 2007 | U p l o a d

Con du b c y D e W i l l N a r h a a t t c y S i l d a H o u r f

We a r r o m e d t a B W e m e t e H u g g h e S t e a r n a t e h W a e n x . p l a t h a e d  
v i s a s t f o l l o w h a u p g d 2 0 0 1 7 h s p e a c n t d i o v r e h , a d u e s t a b o h u c t w a s t e s  
w e g e n e r a a n d e d a g e d s l e x p l a t h a e d l v e o p t e o b t a s i a n m p f l r e n e  
" n o n - r e w g a u s l t a e t w e d s " e v e n t o u t h e f e a c w i l M H y u g h e s w e n h a e d r e t h e  
f o l l o w s e g v a t i o n s :

- Se v e t roatw e s s e t a ci knesdi h o v e r e h d f u s o e f . t h t e o s t e e s s e p a roa d t e h d e  
s t a r c k a , t n h a e i e m t r a T h o e y o . n t a i a m e a d m r o g i o n h a s t e M i H a u g . h s e a s h e  
d i dknn'orh a v a s h h t e o t a e n d h b a g h e e t r h e s r i e n h e t a w b o r r k f j d k r y  
Mc Namara .
- T h e i t a t a h e d o m p a w c e t r o e r s a n t h e r e e r e s e v e r u d o l w t n o t i a s h a e r e A a .  
p a l o l k e i t t w a s e a r 1 b \ y u i g r h s e a s h e o m e t a i a n d s k e i t t y d e s i i d h u e  
t o t a e n d , e s e s n p t i t l o l h f e l o t h r e . k i i t t s t e y f t . ( o n s h t o h v e n t a d d i t u e n o r  
m a n i f e s t a s s i g e a r w d a o s u t S e h ) e o t e k ( p l t g i s e m ) p r e b s a s n e d e n t  
o f f t e h i t f a c e c y c l i n g .
- W e d i s c u h s o s t h u d a s w h a t r e e r - c i r s c y u s l t a e t m i M s H u g h w e a s s o a t b t e u l l y  
e x p h a t t h r e i n t s a e w k e s i c o n n e t c o t h e e d - c i r s c y u s l t a e t m i j n d o f t u e x p l a i n  
w h a t y po e f s a s t w e s d e i s c h t a t r h f e l d b o r M s H u g h . e s n o s r t a h d k d i r r i t n y s e  
t a n w k a " s , s e v d h e t n o t a e f e i w a s t h o e u d M e u s e p d h a p t e r e t s h t e i q i u t i h d e a n k ,

K R M c N a m a r a

I n s p e Catt i 8 0 0 0 1 8 / 0 1 7 6 9 0 7 1 / 0 7

R C R A I D I # \ : / A H 0 0 0 0 2  
P a g e 1 4

... a n d l o u t n h d i a h t t a d p H b 6 0 7 H e s a f l w i a s s w t a e s s o m e d r i a n e s t o d r u a m n d  
m a n a g e d f o s i w t t e u m p t e d d h f e l s a m p .

- 11 Th e o u t t a h r o k u , c l e i a n t a e w k a l s s e f o t r h f e i w a s h - W e w s n p d p a p t e o r e s t  
t h l e i q i u t i h d i a s n a k n f l o u t n h d i a h t t a d p H b 1 3 0 1 4 M r H . u g h s e a s i a u s b d a  
{ p o t a h s y s d i u o a x n i s d b e c ) a b n e l i s p e a n b s o e d e t t h a e n k t d h n a i t g h a t k t e h p e H  
h i g H e s a f l d i s w w a s s t r i e n e c i r o a d u r l a i t t r e f e l s a m p .
- B o t h i n t s a e n c o s n t a i n t d i l r q p s a k s o n t a n i n k d y s , c o d u s M g e .  
H u g h s e a s t b w i a s s i l - p b a a v s a e t s f t r e a t n o t h e s a f l t e o p t e r w v a l b o f u o t u r -  
i n c b e e s i t h e s a h i p l a n t n e h d o v t a h l a e s f t r e d r h r e i n t s a e k d i r n u t m o s l e a n d  
i o t f f a s d i a n g e w r a o s u M r H . u g h c e o s u n l o d t x p w a n l y s t h o u t g p e a t w r a t s w t a e s  
d a n g e . A d u m s r d e i s c u i s a t s p i p o e n a t , h M d H . u g h d e i s d o k t n d h o w t w d e s i g n a t e  
w a s d w h a v b u m a d k a e v a s " t d e a n g e m o u t s . "
- 11 W e d i s c u t s d e e f l i a f t e r a p t t h c e o m p a m r y o ' t f o o c r o l r e p e t d n t i e g ' t  
" e m p M y H " u . g h i e n s d i t l a i t t h e o d e n t a i e r t l s a n i n a h e s i t d h u e e n a s  
c o n s i e n t e p W d a . s k i e t f d h e y e a k e t w i s h o r t e h a n i n a o n e s i a d n u l d e .  
H u g h s e a s t b l y g u t l a k r e t y e s i p w s t e b h i n a c h e f s o o p t r 9 d i u n c t i d e .
- 11 A f l o e a p p e a d o e d t a a e i w n c a t e s q t u h i l e . i g h i t h b e u g i l m a i d i n t i f f i c u l  
t f u d b y e t r h o e e n d o f h i t e r n e . n . c h
- T h e o n c f b d e d p e i r p f e i s l , a t r e d r a s l ; v b e s co a n t h e a s t d e h w e a s t h a n k a s s  
b a d s l t y a i T h e d r . i r e d s i o d t u h f e l w a s h i t e l g o t e n d e v e y a a w d i s d e .
- W e i 1 1 t s p f e l o s t a a n d p o , c a t t h e o u t n h d f h w e a r e h o d t s e a t a l i r e a d i d a d h  
b r o w n / v b i l s a c l o c k u y , t h e r w r a e s l i q m u i i l d k , y l a v y e r a s b t e l t o h b e r o w n / b l a c l  
v i s c l o a u y , e m d t h e a r p e a b e s d e v e i n e d t e s s o l u s d g b e o t W o e m .  
c o l l a e s c a t n e p t l r e y t i o n a g p t a u t r h e r i e a e y W e f s i d e l t e t s h p e l a n f l o u - n t d h l a e  
w a s h t a e p H b 1 3 0 1 4 c l a s s i a t D y a i n g g e W a o s u t s T e h . s a m p w a s u b s e q u e n t l y  
l a b e h o d a c e d o o f l o n f a s a t y s i s .

W e c o n c l o u d r e d e a n t h o e u t h o e f f l e c x e p . l a t h t h w e a s t t e h f e l s a m p e e d t e o d  
b e r e m o v e n d a m a n g o f d a s l a n g e w r a o s u t s e a . i w d a s l o n c e t r h n a e t t d e i g h t o u l d  
h a v i e n p a t h c e o d n c i t h t s e u m s p d h s e y s t e m o a d b t a u s e u h t i t s l v a l u M a r t e d .  
H u g h s e a s i d u n t d e r s a t h l e v o d u c l l d e o a u t h s e y s t e p l a w o a d s i t a e t o t e .

M r H . u g h p e r s o v u s v e d d o p y f h b e i o f l a d f i o n g l m a z a r w d a o s w t s e t t h i e c o r d  
i n d i t l a s t 5 0 0 - g o a f l a l s o t r a e s t w e a r s a n a g e d t b f P t a s c h P t o e w l e a c M a y ,  
2 0 0 M r H . u g h s e a s P l i S l e i r p v h i a p e r s o f t i h w e a s t M r H . u g h a e l s g a m e a c o p y f  
M a n i # 0 0 1 6 9 J 2 0 5 9 i w c a h s r e v i r e u s i l e y w e t l m a g u g u 2 0 0 i 7 h s p e c t i o n .  
E c o l l o a g t y a t w k i e t d h d e i s p o o s n a p l a b y t u h t w a s s t h e i p m e A g g Q s t o t e ) .

W e d i s c u E s c s o e l d o g y n b a b b a s t c e p t b i t t n g a t a e r p h e x t p l l a t h t h w e a s s  
p r e v i o u s l w y i k d R M s N a m i s @ 0 F a l l s o p l a t h t e d l w o a g s y o n c e a r b n e u t t  
w a s d t e s i g a a d i m a h e g e o n f e m o t n - h a w a s d l e s s i w d b l l o w t h e p e .  
i s s u m y c o m p l i r e p a e t .

K R M c N a m a r a  
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A u g u s t 21, . 2007

On August 20, 2001, it is believed that Mohamed Atta and other members of the al-Qaeda terrorist organization plotted to劫持 (kidnap) commercial aircraft and use them as weapons of mass destruction. The plot was discovered by the FBI and the Federal Bureau of Investigation (FBI) and the Central Intelligence Agency (CIA) are investigating the matter.

A u g u 2 s 8 2 , 0 0 7

On Aug 28, 2010 at 1:00 PM, I foogryw & KrPd RMc N a mānī māmē dai cattlieo tñ tdei rrpercotp e r  
mānā g eonfēon rt r d a i g ewas. S tSee. p t e 4m2 @ 0E7c, o lloegfyt e l e pñheasnsa g e  
w i M hH u g ht edsi s ct u hñs t H e or laolgyo n t MrcK. e dMrcyN a m à hpar, e s ò d e n t  
K P M c N a m aOrns e p t e 5m2 @ 0E7c, o lso goyk ieM hM. c N a mānñfao r w ahri dne d p y  
o f hiem mē dai cattlieo tñH e ra hW ou l d prreofbearbil ryo ri ns s tñs a rDya t t il o ,  
h i s - c o nHsesi à M dHnug .hheasodt i s c ut shsee d b w è hñs y et rh o hñha jdus t  
t a l w k ieH h m .

September 10, 2007

## September 20, 1970 | Uniform Specification

Conduct by Devil in Neerlaant by Wijse

At ten Kleine Mirren am alten Markt in Kreuzberg

A frequent problem in law enforcement is the handling of seized evidence.

- MrHug hweassis ol o nvg e rr ka iKnPg c N am a t e ar r B a t e hmoaurl edp l a c e - h i m .
  - MrMcNamsa ar a bl o7u0t% f h oep e r a w a s o n uosnle d - c o n s t o r t Qeqstus h e d t o twæss e n C h i fnqar l a sr te icoy sdMrM. c g l a msa ar ha d i dwna'rtt s e nt dh e m o v e r - b u s le d si dknn'adwñ n y ai n bñse , t va lt e es c y tchbeel cl a s t i c .

On B 9% f hbeu s i w e fs os c uosne b e a annirhegf u r b o t tehsivnagswha ttehra t  
g 9 et s hter e an mthl e amips r w an s h ti hmoqu t so if obetaensd,r d rhsee c o n(ol a r y  
f i m ai ln )sites.e d y lso uotaepayt So mæm o uonf to awpay tiearl a b l otwoed-  
c i r c t udl hætaesshy s t Neos p e ci in ff iocrm a st ri co vci rd b vil os l uoniit,s  
c o n s i s t reanctye/ rc ih sat i c .

- Th韆n c o f i a e h r a s i' t c y a w s a t s (h'p'o t a h s y s d i r u a x y i s d t e) M.c N a m s a a r f a b l e  
s o l u h t a i d p h b 1 3 0 1 4 T. h v e a s f t r e o m s y t s t v e s s u p p d b e r d o u b l e d l a  
h o l d t i a n g h e i n t e a s e u s a d i w t a i t l o d o i r H t e s y a f l l s e o l u w t a i s h n a n a g e d  
s i a t s e a n g e w r a o s u t s h u s u a l a b y e a r b e o d u n t a y e a M.c N a m s a a r f a b l e  
t h o u M g r H. u g h h e a s d o n f t l s e o d a p a n s y s a e m t s e n a s t a v e u m p e d

1 Cont'd. Mtc.Nam 9 Hami Altev OH 44 U P4.0 046 - 36 Fa & G 55 361 - 8956

2 Cont @ e E n i v d i e r o n m e n t 2 1 1 7 S O M C r s u h G t T i u p g l , G R 9 i 7 n 0 , G P 2 1 . 0 5 @ 3 - 6 9 F a x 1 : 1 8  
5 0 3 8 5 - 9 7 0 2

KRMcNamara

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caus b il at to ihfem s am M rM.c Namsar had i dpnl'atb a vce u s t il a to ino-n  
si at my re .

- 11 MrM.c Namsar had a do n s t idur a tw if ot hseu i l d esnagf lter e an reshu m p  
w e lep oox oya tMerW.i ss e h av o u ll idkco p yed r a w i am M sM.c Namsar had  
h ev ou il ndc lt un overi t hree p for r@t me e k s i d e .
- 11 MrM.c Namsar had r r a t feda c a rM rH.yi g hhead l e aenveedr y H s i ariMgd ..  
Hug hteosl idmh 200 - g a w a shtasde epnu m poeudt hfel s am p h w a swtaes  
p l a c a d o MerH.u g hhead l s b e atnhed a cu?n p d r o cpeusm s .
- 11 las kM rM.c Namsar had a iunt- c d m o itaengc lf at hpeo l i cf yod row a s p t b itwrigt h  
r e s i l d es e a t hcd o m p a o y e p n e d au rckntewh i tcoh th e s b R C R A m p t y  
w h etnh a y r i l o e d a h M dH.u g hhead l s c r a ic b e e p t iwnigt htvai tneosb e s  
o i p a b i ab s e M rM.c Namsar had a l o ts e h so u H al th de tam c e ph tese adM. d .  
Hug hhead n ' w i l hceom p a p n y e o y g .
- I. ' aw lk at y p e r a iwa is n g a i MarM. c Namsar had e f f @ S H A r a i a m idn g  
i n f o r m a d "ugbenawærle n e s s . "
- MrW i so p e nt hfei s a m p i Tdh. ew a e s b o tuwtion c b e s q i ut ihdeu m M r  
J o r g esnas folne s e nsourmpas l a ly oaf d voer d if a m a rt leor l d -8a0b0o-ugta l l o  
o f i q lo if df e h a d t h b hseuhmtpu sh ta v e s s p a W h e F c o lsoagnyp tl he ed  
s um pht,e b d t we eam t dh wfc e e w a s a t nead p p e a n o e t dh a a fl u f \$ i nocnel y  
200 - g a w a s w e m o v t eseu;msph o a n H g vae a p o c c a i b t u g 0 @ 4 0 0 -  
g a l l M rMsc Namsar had seu mpa s m p w t hyehna r r o vse i et n H rH.u g hteosl idm  
t h e a t 2 0 0 - g w e hreemso v e d .
- MrM.c Namsar had s w e s p e o fo in kee dy te ahret h o ut ghbe t o if ni d leaurdeewi  
f ot ro x i c s b yse o rtthi as th t oxxa is co irotex It hweas st t e sH es a a rd s .  
c o m p l a a t y e s w t a e s l ha t se e v e r a l a n e s a l d uesaet de r evaani )vTehs i s  
i n f o r m a t b l i e a n daev a i t f a b o e 9 g . y .
- 11 Was w a s e is n t g a g e d \ nhgeo rc te m d f hwea r e h W e s e t t e h f e o l l o w i n g  
c o n t a i n e r s :

  - T h r t e a t l a s b e l' end b a z a r d M rM s N a m s a r h a d e t s o e t c o n t a i n e d  
" unk nmpavtnetrhveat ls e ipnrgo fo jP lheidH esp a t hwea sw a e s r e v i o u s l y  
st c k r e a d a hpe i g mteont t e s x p l a t h a e d lhoagdy r e v i i o d u e s l t y m e s e d  
t o tdeusr ii A s g g u s i t n s p e batsikdehdta htteo tb esla b es l'ewda s t e p e n d i  
d e s i g naantdibat s l h o a z a r d Noaas d' u m usl taat ri t a n s a d a e e d .
  - O n e o l t a b e l' end b a z a r a l o a s s a d h e s i v e " .
  - O n e o l t a b e l' end b a z a r a l o a s s " ' p o l y m e r " .
  - O n e o l t a b e l' eudsoe idM rM c N a m s a r had a dw at s rias i0mle, d. r1ot dt uct te s .
  - T w 5 5 - g e d t l b a b e l' ehdar zd aouwass t Oen" w a n a r kaes'dP al R e s 8 n 1 -  
0 7a" n t dhsee c ovra d a r kaes'dP alR e s, 8 n 1 - M rM c N a m s a r had w a s t e  
w a B e p t s Neor i lsakb e l s a rkentbder u m s .

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- On 5 - g a t u m a n b a ls esdon l o i rd , r e g u l a t i o n s c N a m a r a f a l d w i a s s w a s a t d e h e s o v f e r d s i n t e i t a b l e .
- Fo u t o t l e s o e' h e a d a w a l s d u s y s M i Mcc "N a m a r a d e o d e n t a l i m e d y s o a s p o l u d t r i a i o n e t d h w e a s t y e s t h e e n a f b i a n t a s r o b r a b x w e i d t h c a u s b i l c b t e i c o a n t h s k e i t h a l e e c o n f b M e d u g h @ s e o d e n t a i n e d w a s c t l e e a o u e t d h d e i r t y s e n t x p l a t h M e d u g h t e o s t e t h a h w e a s t e i n c l a u d e o b a a i s t e o d e n t a s i l n u d g v a s f t r e d r h f e l s a m M r M c N a m a r a f a l d M u g h h e a s t i t h t e o t t e f b e e r i H e e M M c N a m a r a ) h a t h a n d d e p r o x 7 t a g a o l w y a o s o t s e u s b i l c t t o i h d e a D e n t o t e c o n t a v i a n s e t a b u s t r a c e d u o t f h s e t a i s t e a b k s .
- M r M c N a m a r a p d s e a d a a g h e b t u o t e f s a s c i o t r e d a i n g e w r a o s u t s e a i d h e o u u l s d e h w e a s p t r e o p r i e l v e i p o r u e s p l a y P e d l i p S e x p v l i a t c h e s t p r i o f i l e w a s t i e d h c e a u s b i l c ( t p i o o t n a h s y s < u h p r r o e x v i i d o a u ) s a l o y e d - I s t i e t e e n e d a p p r o p o e a p e r o d f e i s l i e g v r a a s t b e a s s e n d h f e a t c h M u g h h e a s d o n f u s e d p r o c l e i s a s e v a s h a l e e c r o m m i n M M c N a m a g r a e e d .
- W e d i s c u w h s a t e t y d p e a o l k o s u e r e e t a b d e o m p l l e x p l a t h e a d l o g y ' s i m m e d A i c a t t l i e e h f t o e c r u o s t h o f e l s a m b u t t a h m e e t r a i l t s a e w k o s u a l l d s a v e t a n d e c r l g o o s u n r l M M c N a m a r a a n t n o e s d e h e t r a i c c u m d a a g e w r a o s u t s e t h f e u t M M c N a m a r a r ( a t g e d h a j p o t t h a e s h s y i d u r m s x o i l d w t o i u o l o b t e s e d i m h f e u t a m h e d i n d o a t n t i c i p a t e a r g e w r a o s u t s e t h r e i g m s e t a n k s . M r J o r g e s n a s G o d h e e k w s o i u a l e d d r t e h s e s W A C - 3 0 t 3 a - 0 6 k 1 0 0 s s u t r a e n d f a t r h d e s f l o o r a n s d u r n e p t h n e e t i l i n s a e n a k n s d , s t t h a e i s t l e e s a s t h a e n k e s o a f t h i e w a r e h W e a g e r . e t t h s e t a i s t l e e s l t a a n l k s e e t w b o a d d r e b s e c e a d u s e t h e y s t i k h a l y e a u s e t d a c c u m d a a g e w r a o s u t s e r c u f l r a t t h e d n t s a e n M s M c N a m a g r a e e d .
- W e w a l k e d o t u g e h t s t i o d e o r y a a g M W i s a e d d r e t h s e e - d C o n g e b o s t t o r t e s i d d r p i q o p d i m a g i o n u o t r g l w l e i t h t e o t a r s e t o W e d b s e a t e d s w b l e a k v a r g e s t a t i o n h g e r a l v e a l s b s e a s t d p e n g t i c o i d d e a - n l e i k e a r e a f h y e a t d m a b s a t t r i b u t p e h b e l n e o l - f o r p m a d d N e o s y g e i f i c a n t s p i w l o s s e o v t e h g e r a y a n d o f u o l p l a r t f i u a l d l w e s o d s e r N v b d x c a r s , c a r o g o o n t a d m t h e s e r c l s t e d u a n g w e e s i e s i t h y e a r d .

W e c o n c l o u u d r e s p e b o t f i o t n b e d v a z o d p l e \$ p e r c e t p t o M M c N a m a r a i r a h c t o t p e y r r D u t e h a m a d m e e k C s o i n d s e u M e a t r n t a s e k v e e d r y o t m e e i m a d f t t h s e i a t : 0 0 p .

### S e p t e m b e r 0 7

E c o l r o e g c y e a i n a d h y e s d a l l u A l n a d y T h i e s y a b w t e h d a h w e a s i t t e h f e l o o r s u m p o n t a p h r e a d b l o r m a l a e d h y a d p e h v e 2 T 5 h p h e a a t f o r m a l d e h y d e c o n c e n t r a l t e a i t o t n r s i b l a t p a s t r e e t s i ( d t w o t f e e s p s w e e t r o b s e o n e d a i t e d r u m P e p s t r e e t s i w d a l s d e i a n g u m u l a b t e d p e r j o d r u e c t i d u e s .

### R e q u e s t f o r d i t t l i n f o r m a t i o n

w A C1 7 3 - 3 0 3 p - r 2 o 2 V O t i ( m a ) s t h b o r e i q y d d e t r e p r o a i l s b e u n g i m g e p o m t s , p l a a n s s p e c i f i c a t e t h o s u t a g n t a n d i s p o o s f i g t e i n o n r a a l o g e w r a o s u t s e .

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With India you can do business.

- A p r o c f e l s o s i v a g s r h a m w h i c n t g h w e a s s h y s t i e n s e l d n c b u r o c i e n s s t r u m e n t a t s u c k s a l b a s k e t l e a r n i n g .
  - Aw r i d e s a r o i f p h c e o n t o r p o e l r s p t o c e m p e s t y e i g n o i t n h g e r c h a n i s m s p u i t p l a t c p e r e v t h a e d c u m u o l d a a t n i g e w r a o s u t s e i n t s a e n t k h s f l s a m p r s t a i s n t e s k i n t f e u n t k u n e l a d d e c r o i f p n v y a o s n t c e r e e o n a i n n a g l y s i s a c c o m p l i s h e d c p w a g t t o h f e l s a m p .
  - 11 As i p t lea h o w i r l o c t a h t n d o n l w o n p e r o c t e a s n k e s c o n c o a n r y a b r e m e n t i t t a b t l o e t , e m p r e d s a n o g r e w r a o s u t s e c u m u a l r a e t a i d n o t h e g q u a i b m e n t h / a r e t h f e a c i l i t y .
  - 111 Aw r i d e s a r o i h o R M i c D n a m a p r r a o ' t f o o t r e l s i w a \$ r t e e s n i g w a e w b a t e n s l , o t h w e a r s t l e n s c . l i u n d e o r a n b c a u t h t i o s h e s p o f n s d i e l s l i e w a \$ t w e h g t , t y p o e f s w a s t a e l s a a b n a l y z e d l f u l t i h o g s a s n a d y w f t w e a n s t a e p e r o f f i d l r i e s d p d s t a l . a p p e t a h v e s a t s w h a t e r m o a v y e i r n a e s t , y f f p e r r o e d t u c t a r e s e i n s P e r d b . v s i p d e c i f i c i n f o r a n h a d h u o b l r h v i a s r i a s d d i e g t h i d e d s i g p a o c e a s
  - 111 Aw r i d e s a r i d p f t K i R M c N a m v a i r e l a n s u e s i w d n n o l t e a o c u b t c o m p r e s s e d t o t e n s r o t u t h e e f f d e s t e n P a t b i o i m d f o r a n l a d 2 u 0 b o n h i p m ( e d n a t t s e s , v o l u f m i e d , a s t i h a a n i s p a g n a d d e s q r , o i f p o t w i o m t a m i a p r a e n t v s e f n r t o e n d b e i w n a g s h o e f c d f o m p r e t s o s t d e a d s l h n i g p m e n t .

## Compliance Problems

The following conditions were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the **citation from the regulations**, (2) Ecology's **specific observations** to highlight the problem, and (3) the **corrective measures** needed to fix the problem. A 'Compliance Certificate' is included. It must be compiled and returned to Ecology.

• 1WAC 173 - 30-3F-a01710ndrees i gwaast tees

O b s e r v KFM coNhsma or uNodte mon st th at s h a ll e f r u d a g e q u a t e l y  
d e s i q m a it e r d f d \$ \$ p e n □ a l .

RequAcced~~de~~ons l d gyn b sAicattlieo h(tdearAt w gl Q \$2t0 0r7e)q u e s t e d  
d e s i g n a f o o m c a n v i a q s n h a s a g e d -Tshi it sef.o r m u a s t b w p r o v i d e d  
w i t 7h d i a n o s f e c e f p l t e s t t o e n r c , b u w y a s m t æ n a g e d b e s t w b æ m u a r y  
2 0 0 a n d A d u g Q S 0 7 n f o r m a y i n o w a c p t r e o f i a l b e o s r a n t a o l y s d o s t , h e r  
· p e r t i n f e n n E a c t o i l b o g o s i n t e r i e s t d e e s d i g o a n b o n h a w z a a s r h d o u s  
w a t e g e r l e b r y a a s h t i o n t g e r s a n , "y o m - h a z a e s o n d a r t e a g e d - s i t e .

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With the above findings reflected in the following form, it was determined that the following items were found to be in compliance:

- "A d h e w s a i s (t e r e ' e s i i d u e e ) . • S o a w p a s (t n e i w e d h c i a n u s t i c ) t o t e .
- " P o l y m a s (t l e e s i i d u e e ) . • S l u d g e m i n t s a ( k a t i o d c o n t a i n s t p a i w a t s d e )
- O i r l e s i (d l u a b a e s " l u s b e i d i l r' ) . • W a s f e c r a u s p i r o d a n k " t o t e .
- T h r e e t o e s u n k n w o a w s n t " e . • W a s f e d n h e a m p i x w e i d t h c a u s t o d t u a n t k h e l s a m p
- F l o a d r s b e m m t x w e i d t a s i d u e . w a s w t a e s r e v i d o e u f s i a l n y e d " c o r r d o a n i g e e r o u ' s w a s t e
- P e p s a n t R e p s e t s i e d a u c h . • " S o N o r d , R e g w a l s a t t n e d " i a 5 5 - g a t h u n d r u m .

Designated form may be used by any person to check on the status of the facility. She or he may inspect the facility at any time. Waiver of liability is granted to the facility operator if they do not file a complaint with the state or local environmental agency within 10 days of the inspection. The facility operator must file a report with the state or local environmental agency within 10 days of the inspection.

## 2) WAC173-303 Factual Findings and Observations.

Observation: The facility is in compliance with all applicable laws and regulations. The facility is located in a rural area and there are no significant hazards present. The facility is well-maintained and appears to be operating properly.

Requirement: The facility must be in compliance with all applicable laws and regulations. The facility must be properly maintained and operated. The facility must be located in a suitable location and not pose a threat to the environment.

## 3) WAC173-303-117y042e118n0cfetajituprreopprerptahazzardouswaste manifests.

Observation: The facility has a manifest number of 1672812. The manifest number is correctly listed on the waste manifest. The facility is in compliance with all applicable laws and regulations.

Requirement: The facility must have a manifest number and it must be correctly listed on the waste manifest. The facility must be in compliance with all applicable laws and regulations.

## 4) WAC173-303-200 WAC1(7b3)-(3i0i3)(,5a)n6(460)y4ferric leuromethane and wastewater treatment requirements.

Observation: The facility has a manifest number of 1672812. The manifest number is correctly listed on the waste manifest. The facility is in compliance with all applicable laws and regulations.

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1. n s pDeactt~~8/15/01~~ / 07 & 9 8/11/60 707

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P a g e 0 1 4

a d e q u a t e n c o a n r t y a i t h m d e y n d o h t a v a l e q u a n t i t a r y p o r t s p a b e a l n i d g ;  
t h w y m o p t r o p i e n r s l p y e t o t p d r e v l e r a t s o e s n t v h i e r o n m e n t .

R e q u A c e d E a c t t~~8/15/01~~ d g y n e s A i c a t t l e e t t e r p r e v i t o h o e s e c a l n o a s s u d r r e e s s  
t h f e l s a m F c o l o g d y i s a c l u s s b e c a h o s u f h e i n t s a m k n s t a i n l e a s k s t  
d u r t i m S e p t e m b e r 12, 2017 s p e c t s o l l . b u r i d g e e c p r i o n i d e d :

11 W i t h 4 d a y s e c e f p l t e t f t i e n d i e s c h o n t a m a s t t E g s J o o b g s y e r v e d  
t h a d m o e f h w i c w l a s o m p o t e p t e m b e r 12, 2017 n y e s i ( d u a l s a n t e r )  
g e n e r b a y t e e d o n t a m h i t e a a s t k i s n t g e u n s t p r o p a e c r c l u y m u a l n a t t e s d i g n a t e  
a s e q u i W A C 1 7 3 - 3 0 3 - 0 7 0 .

11 W i t h 3 d a y s e c e f p l t e t a t n e f t e e a n a i s h y s t e e v m a , l e a d h a n k  
s y s t e m t e r i m f a z a r c d o o n u s s t w e u r e n r t e s t s h e e h v i r o T h i m e s t  
e v a l u a n t s t o e n f d h e s p u e r f o r n s a t n a c t e a f r i i d e W A C 1 7 3 - 3 0 3 - 6 1 0 ( 2  
P l e a s e t h a e t t a G u n e d a m C o l e e C a l n o s o l D a J n r g e e W a s u f s e c i l i t i e s  
( P u b l # 0 4 t ) d n

11 W i t h 4 5 d a y s e c e f p l t e t p t r e o r w d e t e p t o E r c l o w h o g i y c r h c l u d e s . a  
d e s c r i p t i o n s t e m i s t r i c t c t h i e s i z e / d i o m f h s e y s s t o m i n t  
c o n f i g u r a t i o n s t h i e n r t p g a m o t f h t e a s k s t A r h p o o v t h d e s a f h e s  
e v a l u a n t c i l o u n d , i n g a n o f f s e r e v n e c e p r a c b r l a g m k s s a s t u a c h . 0 1 -  
i n p h i t t i n g , v o o r i t d a s e n r o n p a i b h b e s i m g r t h t i e s f o r w i b l i s c t o n  
d e t e r i n f a z a r c d o o n u s s t i b w h a d o t t e s e n r e b e a g l e o d u n d w a t e r .

5 W A C 1 7 3 - 3 0 3 a n d 0 0 ( 2 0 y e a r ) e r E a c t u p r e o v a i l d a b t h a t i d e n t i  
t h n e a j o i r s & s o c w a t h e a s i t h e o n t a i n e r s .

O b s e r v a t i o n s r u m a n g e w r a o s u t s e c u m u a l K a M e N a m a i n d t  
i n c l u s b e l s .

R e q u A c e d i l o n m e d i u p b r e e l c y e f p r e s p o a t t p t a n d r u m s e n t h i e f y  
r i s i k t e x c j o c r , r e s t i d W e t , h i d a y s b p h o t o - d o c t u m e n t t a t i i m e n s  
h a b e e p m o p l e a b l y b e d t h i e n f n y e d r i i a s t k e .

6 W A C 1 7 3 " 3 0 3 - 2 0 0 0 ( 2 0 y e a r ) e r F e a n i c h u r e e l o p f a h d w o r  
w r i t i n e s p e c t i e d w g r e n e f r a c l i h i s p e c t i o n s .

O b s e r v a t i o n s r u m a n g e w r a o s u t s e c u m u a l K a M e N a m a i n d t  
i n c l u s b e l s .

R e q u A c e d W o i n t S i C r a l e d h a l y d e , v e a l n d p o l a l o w r i i n t s p e c t i e d n a t e  
i n s p e c t i b i m g t e o q r u i i n g s n a f a n t e l y m e r g e n c y s e e q u u d r i m t e y s e s , a n  
o p e r a t h d h g u e t q u i r p t r h e a n t p e v d e n t t e , c t e s p t o b n d z a t r o d h s p e u b l i c  
h e a d t h e e n v i r o p h m o e a i t o y f h i i r s p e c t i e d n a t e l o g y .

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7 WAC 173 - 303 - 210 by § 4 f & e33ncaei It up to va in de q upae tres on ne l t r a i p r i o n g r F a a m i . It up r ee paanmea i n a v a r i in p teers o tn mae i p li a n t , o ma i n t a a n mei ongr d s .

O b s e r v @ p i e r radstindoste eamb t d e f ti hdei f f ob re et nwde emg earnodu s non - da nwgaes r a c e s i n d o t a w a m fehre i s a k s o cwi iatth a den a g eomfe n t h i g h w a s t Tehs ed yindoste eam o n c earbno supt it lo lhfei coarb otuh te a c c u m u o l f a it gi h d - ipq - lu ti hofel s a mupn a d d r ebsys e o l W o g k d i n d o t s e etma n d e r a s r d a inddatd e q u a d d e r ltehSe a n g eW a o s u R e g u l a t i o n s .

R e q u A c e d W in tsBt Qia yof e c e f p l f es tdteevre a l c a m g e w a o s u t s i a i n g p ro g w r ha nchha h b law d e t t e i p n i a m g le c o r e WAC 173 - 303 - 330 .

8 WAC 173 - 303 a n d 0 r 0 e(f1e)r{e a n d 0 a : i It up r ee paanmea i n a a i n a d e q u a o t h e t i n P g l e a m g m e r g e m o y e d u r e s .

O b s e r v A C o a n s n P g l e a m c s y p o r t e p l a y t h f e a c O p e t y o t o u r l o s t e e m t d e m o m i a f t u r l n d t e e r s b a h f e a i n g l r i o t c y . l s s s e s .

R e q u A c e d W in tsBt Qia yof e c e f p l f es tdteevre a l w a p i c o e n i p g e a m c y a n d e r g e n c y p s r e q e id WAC 173 - 303 - d3450 .

9 WAC 173 - 303 F a 5 0 t p a c a p e r r h a t c e p r t o a d t i s p o s s a n . g e r o u s w a s t e .

O b s e r v M trH. u g h a e csk n o w It e k MecD a m s a o n a e t a i o n e s p o f t h s a t c o n t a i n m g e w a o s u t s i t o w e s m o "t e m p a t s y e " f ii WAC 173 - 303 - 160 ( 2 a n d t h e r K e R M o N a m p r e r a s a e a n g e w r a o s u t s e e a t s m t e o n i a n d e s p o s a l f a c i l i t y .

R e q u A c e d b m n s e d i c a t e s h e r a o t a i c c e e p t b i t w e i g h t a z a D r r e d s o i u d s u e , u n l e b s t s o e t a e r e a p a t s y e f ii WAC 173 - 303 W 1 6 8 0 0 d o a f y e s c e f p t t h l i e s t p t r e o r v a w d e d e s a r o i h p R M i c D r a m a p r r a a 'c f t o e i m c s e u t h i a n t g i l l c o m p u l y t h i s r e q u a t i h f e e n t e l m t e l a d d e s c r o i a p n p y i r o o n t b o o l s d e t e r n h i n t c h t g e s b t' e m p h t o y K R M c N a m e n s a u t r h e a s t a e r e a p t y w h e n h a y r a i t v h e a n c o f u a v e a r h l d d y u s t o a m r e e n s o a r b n e t u h t e i r r e s p o n seim b p i t t l o i p t e r y s t a t f o f s b i p r e e n t .



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**COMPLIANCE INSPECTION**

**Instruments and Sample Equipment** requested to determine if it is in compliance with required actions taken to control off site balanced closure of facility located at 110 W. Williams, Seattle, WA 98105, on May 10, 1998. Requests for additional information or compliance requests made by David L. Williams on May 10, 1998.

The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date each action is completed and sign the concluding certification.

Compliance & Action	Completion Date
1 WAC 173 - 303-50a7i0lt(u)res i gnaastees . Ecological integrity (to include 173-303-507e) questioned. Design of containment structures is adequate. Site management best practices are used. A written form of information in compliance with state regulations is provided. Ecological integrity is demonstrated by soil monitoring information. "genecology at solution, " non-hazardous waste is present. Witten design for facility is complete. Pesticides are stored in sealed containers. Waste removal is planned and documented. Non-regulated	With 30 days
2 WAC 173 - 303-5a14t(m)ri et i gpa itoler es I eases . Written design for facility is complete. Pesticides are stored in sealed containers. Waste removal is planned and documented. Non-regulated	With 30 days
3 WAC 173 - 303-51b7y0 q (2) r1esn0cFet) jilt upreco p p r d y are t hhea z arwdasunsa n ifest . Written design for facility is complete. Pesticides are stored in sealed containers. Waste removal is planned and documented. Non-regulated	With 30 days
4 WAC 173 - 303-520(1)(a)1, 73 - 303(45)a(n)(\$b) y refer to inspection report for details of inspection results.	

KRMcNamara

Inspection Date 08/01/2017 9:00 AM / 07

RCRAWD# 0000252

Page 14

<p>furd hee icst riconid ed :</p> <ul style="list-style-type: none"> <li>With 4 days of effl flow to tank storage system to obgsye t h s admoef h i sw a oonk p o e t e September 12, 2017 n yes i( d u a s a h g e e n ) e rbay t o d de con t arn htaast kisntgeund st r o paerclum ualndt ed des i gans a e q di M A e O l _ 7 3 - 3 0 3 - 0 7 0 .</li> <li>With 30 days of effl flow to tank storage system eval uad t h s y s t e m ? t ei hra z a ecoonusst w e n e n r elata ts hech v i r o T h m e s n at l. umautsni boeth cel os ure per fo rsmt amcotee rf dist WAC173 - 3 0 - P611e0a(s2f) o r t haet t a G th e d l a n C a l ro: soU D r a e n g d W a o s u f s e c i i t i e s (Publ # 04 t 1 0 1 ) .</li> <li>With 45 days of effl flow to tank storage system wh i chhc l adde ss co r f p h t e a o y s t e onn s t r e ct g h i e n s i z e / d iom f h r e s is oys d e m f, i g p o i p a t t n g t, n, e r i n t p g r o a t f h t e a s y s t e m ) . At h s o r e f i s h e d it de eval uant ci lornel, f e t g e m o y l e s e p v e b s e r a r r a c k s g reat h n 0 1 p i n t o h n p d e s b, b o l a t h g e n o m a i l h e s conc r e t i e s f o r m i b l a i so n d e t e r i m f a z a e r d o u s c o n s t c b uh a d t e s e r e l e t a s o o d g r o u n d w a t e r .</li> </ul>		
<p>5 WAC173 - 3 0 3 a n d 0 0 ( 2 1 ) yr (edf) e r e a c t u r e v a i d e lab t h l a d e n t h m e a j e s i r s h s p c w a t l e v a s i t h e c o n t a i n e r s . Immed uap treelcye f p r i e s p b a t t e r a e r u m d e n t h r e i f s k l m m e d i a t e l y ( i t e x j c , ectodW.ri)d . B i ch a s y s o p h t o - d o c t. h u a n t a t i o n c o n t ahianke s m o p learbley d e d t h i e m f y e d r i i a s t k e .</p>		
<p>6 WAC173 - 3 0 3 - a 2 n 0 0 3 ( 2 1 ) yr ( 2 e ) f e r F e a n i c h e u r e e l o p a n d / o r a w f o il t l b e n n i n s p e c t o r e f r a c k h e s p u l c e t i o n s . With ca l 30 days , a e f i c e l a k o p w i t n e s p e c o t h i e d r a i l e i n s p e a m t b i n n i g t e o q r u i n p g n a e f a e t t d y e r g e q p u i y p s n e c u t , d e v i a c r e o s p e r a t i n g g u e q u i p t h h a e t p p e v d e n t t e , c t , r e s p t o b n a d z a t r o d h p e u b l i c o t h h e e a v t h o p h m p e v n t d . e y a t h i n s p e c o t h i e d r a c e l o g y .</p>		
<p>7 WAC173 - 3 0 3 - a 2 n 0 0 0 y ( d f ) &amp; e - g ; F a e i l t u r r e v a i d e a d e q u a t e s o t n m a e i p n r i c n g g r F a a m i . I u r e - a n d p i r e p a r e w r i p t e e r s o t n m a e i l n i o g m p a l i a n t a a i m e i n o g r d s .</p>		
<p>With 30 days of effl flow to tank storage system pro gwh a n s h a h b a w d e t t a i p n i a n g l e c o r e t a s C173 - 3 0 3 - 3 3 0 .</p>		
<p>8 WAC173 - 3 0 3 - a 2 n 0 0 0 y ( d f ) &amp; e - g ; F a e i l t u r r e p a n d e m a i n a a i d r e q u a t e s o t n m a e i l n i o g m p a l i a n t a a i m e i n o g r d s .</p>		

KPMcNamara  
Inspection No 18/017 & 9071 / 07

RCRA MDA# 00025256  
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b e e m y k n o w l a e d b e e t i r e a f e c u a a d e m p l e t e .

K e rK r M c N a m a r a s i d e n t  
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S T A T E WASHINGTON  
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Demurrage Name :  
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The Department of Energy's National Renewable Energy Laboratory has completed its first study of the potential environmental impacts of wind energy development in the Western United States.

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1 7 3 - 3 0 2 a ) m t e e t l .

Please email 60-407-6348 (dewi@wyeoys.twi.org) a botuhet poorretq uaicreteida masl. svaith me to teyt hau y our  
consultants.

# **P ? J . a t -**

Dear Inspector —  
Hazardous Waste Removal Program  
South Greeley Office

**Enclosures I: Rapport**



c c : Douglass Vea, ncoWavters o Protection  
( Douglass Vea )

Brengers e kEsn ivdier o Graes t(altrenngt r j 1@comcast.  
ErK inrCgr,e e kEsn ivdier o Graes t(altrenngk i n g 113@comcast.

Fac Name <b>KPM CNAMARA</b>	Fac Type <b>QG</b>	PAGE of <b>2</b>
EPICRAD# <b>WAH0002556</b>	Inspected on <b>05/07/08</b>	
Sigantact: <b>Terran Ductchopara (06317)7 - 3088W i mls SWRO - HWTR</b>	Inspected by(s) <b>Douglas S. Swanson Protection</b>	
Address: City: Zip: <b>508 Mari Av Bel, B61, Vancouver WA 8661.</b>	X Full inspection	

Phot taken. (circle): Sample(s):

Note(s) (list any expected):

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

- Biogland # 15772500 - goat waste tank - Regulated under RCRA Part A, RY 2008.
- Biogland # 1585660 - goat waste tank - Regulated under RCRA Part A, RY 2008.
- Biogland # 1595825 - goat waste tank - Regulated under RCRA Part A, RY 2008.
- Biogland # 00108700 - goat waste tank - Regulated under RCRA Part A, RY 2008.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

The wastewater treatment plant is located at 508 Mari Av, Bel, B61, Vancouver WA 8661. The plant consists of a primary clarifier followed by a secondary clarifier. The secondary clarifier is a rectangular tank with dimensions of approximately 100' long by 50' wide. The tank has a depth of about 15' and is covered by a metal roof. The plant is owned and operated by the City of Vancouver. The plant is used to treat domestic wastewater from the surrounding residential and commercial areas.

KRMcNamara's practice) May 2098

Page 2

We concern ourselves about the safety of the environment and the health of the people. We believe that the environment is important and that we must protect it. We also believe that the environment is valuable and that we must珍惜 it. We believe that the environment is fragile and that we must protect it. We believe that the environment is important and that we must protect it. We believe that the environment is fragile and that we must protect it.

On May 2008, we conducted a site visit to the facility. We found that the facility was in good condition. We also found that the facility was well-maintained. We did not find any significant environmental concerns.

#### TABLAE WASTE SUMMARY

Waste/Product Observed	Amount	Location	Management
1. " Pesticide DW	One 550gum	Dangerous Area	Managed in accordance with RCRA requirements.
2. " Residual DW	One 500gum	"	"
3. Pesticide DW	One 250gum	"	Labeled closed.
4. Residual DW	One 250gum	"	Labeled closed.
5. Chromate DW	One 250gum	"	Labeled closed.
6. Wastewater tanks	Twelve 500L pools	Dangerous Area Tanks	Used as a storage vessel for accumulation of waste products.



Washington State  
Division of Ecology

Wash i S d t D e p a r t m e n t o f E c o l o g y  
Int e Addre s s p : / / w w w . e c v . w a . g o v

Sub Region	Northwest Region	East Region	Central Region
PO Box 47775 Oly mPAl9a8 504 - 7 Phone (86400)7 - 6305 FAX (36400)7 - 6305	31906 Ave 7B e51 WA 98008 - 5 OPhone (42654)9 - 7000 FAX (42654)9 - 7098	4601 Mon Stote 598 Kan 9WA 5 OPhone (50392)9 3400 FAX 503929 - 3529	1 West Yakima 0 Yak WA 8902 - 3452 OPhone (509) 75 - 24 FAX (5097)5 - 2809

## N'OTT COMPLY

1. You must comply with the terms of your permit.
2. Are inspections being conducted in accordance with regulations?
3. For environmental violations, are enforcement actions being taken?
4. Corrective action is being taken to eliminate the violation.
5. All inspection findings are being corrected in a timely manner.

Insp eCtory	Compliance Case Evaluation	DCAV	D C D I	D F U . I	D Other	PAGE
Fac Name:	Compliance Case Evaluation	Follow-up				

Fac Name:	Inspected:	Inspector:	Signature:
KPMcNAMARA	05/07/08	Dewill SWRO, HWTR	
		oo - Vancouver Water Reclamation	
		Terranea Rd (95317)7 - 3088	

Violation:	Written Summary of Violations and Address
(WAC 73 - 303); - 141 (2)	<p>WAC 73 - 303 - 141 (2) specifies that no person shall discharge or cause to be discharged into any water body or into any stream or body of water, any waste or pollutant which contains any oil, grease, or other materials which are deleterious to fish, shellfish, or other aquatic life.</p> <p>Observation: No oil or grease was observed in the water sample collected from the stream. The water sample was clear and transparent.</p> <p>Request: A copy of the permit issued to the facility is attached to this document. Please review the permit and let us know if you have any questions.</p> <p>When the next inspection is scheduled, please provide the following:</p> <ul style="list-style-type: none"> <li>• Documentation of corrective action taken for any violations found.</li> <li>• Copies of any permits issued to the facility.</li> <li>• A written summary of waste generated following:</li> </ul>

NOTICE OF COMPLIANCE	PAGE
<input type="checkbox"/> 630 (6)	<p>WAC 173-303-210(4) &amp; (b)(6)(B)(ii) It is determined that the hazardous wastes contained in the drums and barrels are not listed or characterized as regulated hazardous wastes under WAC 173-303-210(4)(a) through (d).</p> <p><u>Observation:</u> It is determined that the hazardous wastes contained in the drums and barrels are not listed or characterized as regulated hazardous wastes under WAC 173-303-210(4)(a) through (d). At approximately 2250, 08h, it was observed that the drums and barrels were labeled "Hazardous Waste" and "Non-Hazardous Waste". The drums and barrels were also labeled with the date of generation and the name of the generator.</p> <p><u>Requirement:</u> The drums and barrels must be labeled "Hazardous Waste" and "Non-Hazardous Waste". The drums and barrels must also be labeled with the date of generation and the name of the generator. The drums and barrels must be stored in a manner that prevents contamination and damage to the drums and barrels.</p>
<input type="checkbox"/> 640 (6)	<p>WAC 173-303-210(4) &amp; (b)(6)(B)(ii) It is determined that the hazardous wastes contained in the drums and barrels are not listed or characterized as regulated hazardous wastes under WAC 173-303-210(4)(a) through (d).</p> <p><u>Observation:</u> It is determined that the hazardous wastes contained in the drums and barrels are not listed or characterized as regulated hazardous wastes under WAC 173-303-210(4)(a) through (d). At approximately 0921, 08h, it was observed that the drums and barrels were labeled "Hazardous Waste" and "Non-Hazardous Waste". The drums and barrels were also labeled with the date of generation and the name of the generator.</p> <p><u>Requirement:</u> The drums and barrels must be labeled "Hazardous Waste" and "Non-Hazardous Waste". The drums and barrels must also be labeled with the date of generation and the name of the generator. The drums and barrels must be stored in a manner that prevents contamination and damage to the drums and barrels.</p>

# W a s h i n g t o n p a o E m e r i b a g z y a r W a s u s t e o x R e s u c P r i o g n a m

## CHECKLIST SUMMARY OF VIOLATIONS FOR GENERATORS OF HAZARDOUS WASTE (Page 1 of 2)

EPA RCRA #: WAH 000 025 256	Facility ID #: KP McNAMARA	Facility Name: KP McNAMARA	Inspection Date: 05/07/08
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### Inspectors:

Dewitt SMRQ - HWTR  
Douglas VanCouver Person Program



W a s t e

### Instructions:

- Violations shall be checked off in the **Noncompliance** column.
- Document that violations have been corrected within 60 days, then mark **Compliance**.
- Certificate.

Facility uses all of the following practices:

V=Violation NA=Not Applicable PV=Previous Violation (from previous inspection)

WAC Code

173-303+

Condition(s) of facility required:

Facility uses

V

Section	Code	Condition(s) of facility required	Facility uses		
			Violations	Noncompliance	Compliance
Hazardous Waste Management	-070 (8)	Quarantine - Isolate areas where wastes are handled for at least 60 days, so no cross-contamination can occur.	D	D	D
	-070 (7)	Corrective actions must be taken to eliminate violations.	D	D	0
	-070 (8)	Corrective actions must be taken to eliminate violations.	D	D	D
	-070 (8)	Corrective actions must be taken to eliminate violations.	D	D	D
	-060 (5)	Corrective actions must be taken to eliminate violations.	D	D	D
Quality Assurance & Control	-060 (1)	Sign a EPA Numbered Agreement at the facility website (www.wa.gov).	O	D	D
	-060 (2)	Review and submit annual reports to the state agency.	D	D	D
	-060 (5)	Annually report on compliance with regulations (170-220(1)).	D	D	D
	210 (2)	Copy of Annual Report to the state agency.	D	D	D
	-210 (3)	Was designed to satisfy regulations (170(2)).	D	D	D
	-180 (1)	Written procedures to prevent contamination.	I	J	D
	-210 (1)	Sign a Declaration of Compliance (170(2)).	D	D	D
	-220 (2)	A review of procedures to prevent contamination.	D	D	D
	-140 (2)	Record of site history and waste management activities.	D	D	D
	-070 (7)	Corrective actions must be taken to eliminate violations.	D	D	D
Waste Minimization	-170 (3)	Prevention of waste generation.	D	D	D
	-300 (5)	Request for a waste minimization plan.	D	D	D
	-170 (1)	Water conservation.	D	D	D
	-070 (4)	Water efficiency.	D	D	D
	-070 (6)	Appropriate handling and disposal of wastes.	D	D	D
	-142	Statewide hazardous waste management standards.	I	J	D
	-630 (5)	Acceptance of hazardous wastes.	D	D	D
	-200 (1)	Waste handling and disposal facilities.	D	D	D
	-630 (3)	Containment of wastes.	D	J	D
	-630 (5)	Containment of wastes.	D	D	D
Waste Reduction	-630 (7)	Containment of wastes.	D	D	D
	-0132 (3)	Solid waste management plan.	D	D	D
	-630 (6)	Waste minimization plan.	I	J	D
	-200 (2)	Solid waste management plan.	D	D	D
	-630 (8)	Containment of wastes.	D	D	D
	-200 (1)	Containment of wastes.	D	D	D
	-630 (4)	Containment of wastes.	D	J	D
	-630 (9)	Containment of wastes.	D	D	D
	-60 (5)	Minimization of wastes.	D	D	D
	-200 (2)	Waste minimization plan.	D	D	D
Waste Treatment	-016 (5)	Containment of wastes.	D	D	D
	-505 (2)	Disposal of wastes.	D	D	D
	-802	Compliance with permits requirements.	D	D	D

EPRCRA # : <b>WAH002556</b>		Fac Name y <b>KPMcNAMARA</b>	Ins p e c t i o n ( Page ) <b>05 / 07 / 08</b>
		Fac is It isatty s a l ufaotra diht emt h C is e c k a lsfios It l o w s : V=Void N=No t=abel P=previous V=d toni	
WAC Code <b>173-303</b>		MQ G a n d . R e Q u i r e m e n t s .	
		Fac iS l iatty V N A P V	
<b>ac</b> <b>ction acc</b> <b>ag</b> <b>an</b> <b>ic</b> <b>e</b> <b>p</b> <b>u</b>	- 340 ( 2 )	Commun idceavtiicoens / a l vdiudnslng evraosutse ' h[arbeyle 2 0 0 ( 1 ) ]	D D D
	- 340 ( 1 )	Emer g e q u i p m e n t i d e d / i n d a i n g tvaibstasot um ualraetair 0 0 ( 1 ) ( D ) ] D D	
	- 201 ( 2 )	P o s b et de le p hmenreg Geoncrys i naamteo ph' osm uem bFei D, e p th o nleotc a t i o n s of fierxet l n a u lcsohnentrast, e a siemlvsilar eaeramu l o(nMeQGh If vr levf 1 7 0 ( 2 ) ( D ) D D	
	- 201 ( 2 )	D e s i g n a e t r e g l e o n c rydwi hnaetsopre a desmer g e a o y d f i a riteisptay n se m a k e s t i f i e ma et ri atermsc e la e a e h e r h v i r o r f m e l s r b e y 7 0 ( 2 ) ( D ) D D	
	- 220 ( 1 )	G e n e r a l i n s p e c t i o n d y [c r t e e f 2 . 0 0 y ( 1 ) ( e ) ] J	D D D
	- 220 ( 2 )	G e n e r a l i n s p e c t i o n d i e v e laompted l p r b e y - 2 0 0 ( 1 ) J	D D O
	- 320 ( 2 )	G e n e r a l i n s p e c t i o n d i e l retty p b e p s e s b 1 e m 6 & [r r b e y - 2 0 0 ( 1 ) ]	D D O
	- 320 ( 2 )	T(hc)e r e q u e s t i o n m i l e g g y & earst bien s p e c i t y o 2 0 0 ( 1 ) ( e ) ]	D D O
	- 340 ( 4 )	A r r a n g e m e n t s a s t h o r e i m t e i r g a s e n s c i y s a t n a d r e s p o n s e a daen d d o c u m e n t y @ 0 0 e( } e l f	D O D
	<b>olac</b> <b>tive</b> <b>c</b> <b>u</b>	- 515	R e q u i r e d b u t n u s r e g f t e m e r g y o w e e m a y t .
- 515 ( 4 )		U s e o d i n l a n a g e - s p e e c t h s e s e d p e c i f i c a t i o n s .	D D D
- 515 ( 5 )		U s e o d i n l i xve idd a n g evraosutsea n a g e d a n g e r o u s w a s t e .	D D D
- 515 ( 6 )		C o n t a o i t n a e n d k e s s e d l a b w i t h e o r "d l s S e id l b r y 4 F R a 2 7 9 . 2 2 ( c ) ( D ) D D	
- 515 ( 6 )		O n i p l i c l l e s a m p l y r e f F R a 2 7 9 . 2 2 ( d ) J	D D D
- 515 ( 6 )		C a p y ( t a g i n s e e r d s e p l o s e d e p d a r e m a n s e d l .	D O D
- 515 ( 6 )		I u s e d i r a n a g a n d a n t h a c t s a t h r e b a u t m a s a l t i h e e h v i r o s n e c o n d a r y c o n t a i s m e n t d e d .	D D D
- 522 ( 2 )		A n t i f c o o n e t z a i e r b e e r S p e n t A a n t s d i f o i e r e n d a z e n t p i r e v s p o n i f t e l . s g c o m p a c t o n t l a o i m a n p s r , m e u a r b d a i c s e e s o n c o n t a r y a s t r i m e t t u r e s )	D O D
<b>nc</b> <b>i</b> <b>/</b>	- 120	R e c y a l e i n g i m e n t f r a c s i l i t y .	D D D
	525 ( 1 )	(R)e g (u) l i a t e d o p q r u e a c m i t o t u s l e s v o a n s t a e n n i f o g s f i t e d .	D D D
	- 505 ( 2 )	R e c y c l i a t b l e n e c i t a l s a g a v d a t y h i a s u e n s t d i t s p v i n t g l d o n p l w y i t r h g (s e c t - i l o t h s r o - u p a l t o )	D D D
	J 5.05 ( 2 )	Q e p p w h e P w i s s e d a m a n r e o n s t d i t s p d i s a g l .	D D D
	525 ( 1 )	R e c y c l i a t b l e s a g e d m p l w i a g t e e n n a h o f e s q u i n g e m e n t s o f - D 8 0 D D	
<b>f</b> <b>/</b>	- 145 ( 2 )	A s p a d il l e e n v i r o n a n e p o t r e c o d l i o n g m e d i a t e l y	D D D
	- 145 ( 3 )	A s p a d il l s c b D W g l e a z a m d a t u e s v a a p l p r o p m i i t a g e l d y d r o l l e d	D D D
<b>!"</b> <b>Q</b>	L Q H U W : < 11 K U W s & < 2 . 2 K L a m p s	- 573 ( U W ) a n a g a d w a t h p a r t e v r e n t e s t a d h e e n v i r o n m e n t . - 573 ( U W ) a p t r e o p l e a r b l e y i n e d k "e l d n i W e a i s t " a M , a " s o t l e U , s " e d l l b o y w h e b w o r d s " B a " t M e e r r o v l l t i e r s b ) s . "	D D D
	L Q H U W : > 11 K U W s o r > 21 . b 2 s K L a m p s	- 573 ( U W ) a n a g a d w a t h p a r t e v r e n t e s t a d h e e n v i r o n m e n t . - 573 ( U W ) a p t r e o p l e a r b l e y i n e d k "e l d n i W e a i s t " a M , a " s o t l e U , s " e d l l b o y w h e w o r d s " B a t t e r y ( i e \$ ) L a t h p M e r c u r y "	D D D
	D	- 640 ( 6 )	D a i l y l o s p e k t r i f o n h a n d b o k g e p d ) .
D	- 640 ( 5 )	T a d i k d e q u a a t b e l l y r d h j r o i a s n k i s f i b d e p a r s e b y - 2 0 0 ( 1 ) ( b ) ]	D D D
D	- 640 ( 4 )	S e c o n d o n r y a f m a e e a k a s t a t n e p r e c i p i t a t e a l s e p r e c i p i t a t e d	D D [

I S a c i a H I Q Q DW( g e n e r a t e g o o g o l o n s b e , m o n a Q ) Y E S ! B f J x o m g L Q G e C h e c k l i s

N o t e s :

## Washington State Department of Ecology Hazardous Waste Program

## CHECKLIST SUMMARY OF VIOLATIONS FOR LQG GENERATORS OF HAZARDOUS WASTE (Page 3 of 3)

EPA RCRA #: <b>WAH 000 025 256</b>	Facility Site ID#: <b>KP McNAMARA</b>	Facility Name: <b>KP McNAMARA</b>	Inspection Date: <b>05/07/08</b>	
<b>LQG Generator</b>  <b>Dangerous Waste</b> <b>DeWitt SWTR - HWTR</b> <b>Double Seal and Cross Seal Protection</b>				
<b>Instructions:</b> 1. Verify facility has received inspection notice and completed. 2. Document that corrective action has been taken to address identified violations, including any corrective actions taken. <b>Certificate:</b> Facility status is evaluated for each item on this Checklist as follows: V=Violation NA=Not Applicable PV=Previous Violation (from a previous inspection)				
WAC Code	LQG Requirements (Generates more than 1,000kg/2,200 lbs/270 gallons per month of HW)	Facility Status		
		V	NA	PV
6. E. a. s. Re	50a(n3d) OWa c c u m w lsa i f t e d m o r t h a d a y s . b yr-e-f2 0 0 ( 1 )	D	D	D
J	330 ( 1 ) The training program was appropriate and adequate.	D	D	D
c. q. t. i. e. s.	- 330 ( 2 ) A DW training plan was adequate and available. [ref by -200(1)(e)] Was the plan thoroughly reviewed as part of this inspection? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	D	D	D
e. f. l.	- 330 ( 2 ) A written training program was prepared in advance of 200 ( 1 ) ( e ) J	D	D	D
c. c. f. l.	- 330 ( 3 ) Persons in charge of the class were qualified to teach it. [ref by -200 ( 1 ) ( e ) ]	D	D	D
c. c. f. l.	- 350 ( 2 ) A continuing education program was established in 200 ( 4 ) J	D	D	D
c. c. f. l.	- 350 ( 3 ) Continuing education classes were taught in accordance with state law. [ref by -200 ( 1 ) ( e ) J] a state licensing board or equivalent body approved the courses offered. [ref by -200 ( 1 ) ( e ) J]	D	D	D

## Notes:

The training plan does not include a written training program developed in accordance with state regulations during the inspection.



	Wash i ngton D ept a r tme nt o f Ha gza r dous & To xic Red uct ion - P r otection
V I A S T A N E G T O N O N E C O L O & V	Int e nded t o s p : / / www . e c y . wa . go v

I S S u l t h R e g i o n a l	D e N o r t h R e g i o n a l	D e E a s t R e g i o n a l	D e C e n t R e g i o n a l
P O B o x 4 7 7 7 5	3 1 9 0 - 1 4 6 / 6 E	4 6 0 N M o n t o r e	1 5 W e s t Y a k i a n t e 0 0
O l y m p i a 8 , 5 0 4 - 7	7 B 7 e 5 l W A 9 8 0 0 8 - 5 3 5 2 k W A 0 9 2 0 5	Y a k i a 9 , 8 9 0 2 - 3 4 5 2	0
Ph o n e ( 6 0 0 ) 7 - 6 3 0 0	Ph o n e ( 4 2 5 ) 4 9 - 7 0 0	0 Ph o n e ( 6 5 0 3 9 2 ) 9 - 3 4 0	0 Ph o n e ( 6 0 5 9 7 ) 5 - 2 4 9 0
F A X ( 3 6 0 0 ) 7 - 6 3 0 5	F A X ( 4 2 6 5 4 ) 9 - 7 0 9 8	F A X ( 5 0 3 9 2 ) 9 - 3 5 2 9	F A X ( 5 0 5 9 7 5 - 2 8 0 9

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- 6 4 0 ( 6 ) 0	0	D	



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KPMcNamara - Vancouver Department of Technology  
Planning and Facilities

J - b e l l p o w i n g j o l e s c w i l l e s l l t o e r s d a o m p l w a t t e  
 Sta D a n g e W a s u R e g u l a W A C 1 7 3 , a 3 1 0 6 P M c N a m a r a - V a n c m . r v  
 f a c i l i t y .

**WAC172 - 3 WasD signation**

1111 G i v t h e a r i a l s i t t e a n t e d o K P M c N a m a r a l a  
 d e s i g n w a s t e h 2 e 5 0 0 - v g a t h e r o n t a g a s s a n g e w a s t e

1111 P r i m d i k P M c N a m a r a l a s a i t g e h w a s t e s k u d f h y - l i t t e r  
 c o n t a m i n e a s t i e d u r i v g a n d t h e i s m a l t i e d r T i h a d s a s t e s w i l l  
 n o b t a d d t e o m a n a g f e f d w i s t o h t e s t h o e t e s

1111 A l d e s i g n i n n a f t o i r o n n a b l e l e e o n r i t - a n n o a d e e a v E c o d u p p o e n  
 r e q u e s u p t p o d r o t c i u m g e n e a s p o r e o f a i n d e a n a l g a t a w a d l  
 a i s a v a i l a n b y a s t t e h a i d t e e n t n b i d h r e o d n d h o a u s i a l r l  
 h a s e p p r r d a c e m e n t h a d v i n t h e a s t a b e e s i g n a c t o r d i n g  
 t W A C 1 7 3 - - 3 0 3 i - 0 1 - 0 a l s o d l e s i g n ( n g a e n i d o n a t O b d g e )

**WAC173 - 3 0 S p 6 4 a u p**

1111 S p i a l r l ' s D o r h e b s t k e n t a a i 1 c e b e s a n a e s d h - b u g p p p S e p n i t l h l a s t  
 t l a u t k e n m a e a o l t t h e n v i r a n i e 1 n 1 t m e d p o a t s e e q d u i i n r e d  
 W A C 1 7 3 3 1 4 5

1111 C l i e ad1e1budps , w l d e s t d g u t t e k s q c u m u f r a t e d  
 s u b s e d q e u s e i n g t e n r e p t r i o p r e s p o s a l

■ S p i t l o l h e r e o n s c h n p i b e l l e a p i e n d e d i s a t t i e q l u s i q d t  
 a c c u m o l a s f t e a n d i i i n t s h y e s r t . e m

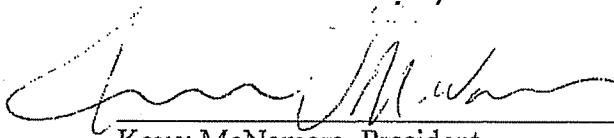
**WAC173 - 3 0 8 k t 6 a 4 n 0 d a r d s**

e R i n w s a e t f e i l d r h e a s h - t r b a g p s i p t e o d h 2 e 5 @ a l p l o v i n g t e r  
 s t 0 t a g R e i s n s v i i t g p k b a t p e e v e n f r a m i q u m i u l h a t e i n g  
 f l d o e o n s c u h m p h e ; s n y s t p e r n p a l s p e r s p a n e k t s o , i b l  
 i n s p e a k y q u i W r A e C t 1 7 3 - 3 0 a . n 3 d h s @ y 4 s 0 w , e b h a i n t a i n e d  
 t m e d W A C 1 7 3 - 3 0 8 q u 6 4 0 m e n t s

- ; \ ¥ A C 1 7 N o n 3 - Q 3 e - O p 5 e 0 r { a 2 t } i f o m p t o y A l e c s c e p t e d )
- m K R M c N a m w a i n l a b t p e a a d a n g e v a c t u r e a t m e o t i s p o t s a a g e  
f a i c t i M h G o m p v a i n y o d t c c t e q ( t e o s t h c o t t a w i i n t e a r s s t ) b a e  
w o u d l e d s i a R A - r e v g a u s u a t L E S S o n h t a s i e n e p a t s y "  
d e f ii W A C 1 7 3 - 3 0 3 - 1 6 0
- m K R M c N a m w a i n l a b t c t e q ( t e o s t h c o m t a t i h a e t b e p e s t <sup>1</sup> j c i d e s  
a c u b e z g w d s u t s o x k d r b a e z a y a d U N L E S S c e o n t a i n e r s  
i s e m p ( t i y i h e a b s e e n i r p i h a s s e e d q u i W r A e C d . 3 - 3 0 3 - 1 6 0 ) .
- m I o t e o r t h e o t r a i n b a r e s " t R C R e A n p a y b o t W A @ 1 g ? 3 - 3 0 3 -  
1 6 w o i n l o b t e f f - a k E M d c e N d a m i a M r a a n c o T h e y i n l o b t e  
a c c u m a t a s e i e t d e m p y e r o i f o t d i m e . T h e s b e s b o p p a d n e r s w  
d i r b o t t b y g e n e r f a t i n g i t y .
- m E m p l o h y a e b e e s e n a t i o n r e d e W s A t C a n d - 3 0 a 3 n k d n 6 w h , i c h  
t o n e g r h e t q t u r i r p l o r r i n s c i e n g T a b a g e e t s e m a f i o e d  
s c n s h e i p r a e c o b \$ K R M c N a m a p o a l f o s t y a c e p t a n c e  
r e j e c t i o n .

---

I h a v e s p o n f s o t h e i v b a d y p l o i K R M c N a n i W a a r n a c o u v e r ,  
W a s h i n g n o n u a y t h a s i g h t p a n t o t d h i e r f o r p r e s t i a n i n g  
c o m p l i a n h s e a D t a e n ' g s V r a o s R e e g u l a d e t b u n s p e e n a f t t h w a t  
t h a e b o s v e a t e m t e m a t e s c u a m a d o r p b l a e s b e n d y k n o w l a e n d d g e  
i n v o l w e r t K R M c N a m a r a - V a a c o l u a v i n e y h a e b o v e Q b l i c e s  
p r a c a t r i c h a s t g h e e n s t t a h t i e s m b e p t d a a t n e d g b y a d a , r s 1 u b m i b t e d  
g y E e o l e .



12-28-07  
Kerri McNamara, President  
KP McNamara

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<sup>1</sup> T h i s c l u s h e d r e b i f a i n d g e i l s n , i s d e e c s b , i o c a i n d o s d , e 1 . 1 T h i t e o j t w e s l  
u s u a b n l a y h a d " p o o i t s h d e a n t " e S 1 a i f a e l t S y a e n e a t y d e t s p o e r n i d b e c t  
i a p e s t h e i b d e q i n g e p s e d e b t i l o c c i i d d e e , n e t t i c i d e ,